



DEPARTMENT OF CITY PLANNING 450 MCALLISTER STREET - SAN FRANCISCO, CALIFORNIA 94102

NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: December 27, 1985

Lead Agency: City and County of San Francisco, Department of City Planning

450 McAllister Street - 5th Floor, San Francisco, CA 94102

Agency Contact Person: Carol Roos Telephone: (415) 558-5261

5/5

t Initial

Project Sponsor: London and Edinburgh Trust

Project Contact Person: Charles Graham

Street, South side between Battery and Sansome Streets.

): Lot 15, in Assessor's Block 267

SAN FRANCISCO PUBLIC LIBRARY

> REFERENCE BOOK

Not to be taken from the Library

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ICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL is determination is based upon the criteria of the ary for Resources, Sections 15063 (Initial Study), 15064 t), and 15065 (Mandatory Findings of Significance), and mented in the Environmental Evaluation (Initial Study) for

Please see attached Initial Study

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: January 6, 1986

An appeal requires: 1) a letter specifying the grounds for the appeal, and;

2) a \$35.00 filing fee.

D REF 711.4097 T9309

BARBARA W. SAHM, Environmental Review Officer







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450 McAllister Street - 5th Floor, San Francisco, CA 94102

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Project Title: 84.432E:

235 Pine Street

Office Building

Initial

Project Sponsor: London and Edinburgh Trust

Project Contact Person: Charles Graham

Project Address: 225-241 Pine Street, South side between Battery and Sansome Streets.

Assessor's Block(s) and Lot(s): Lot 15, in Assessor's Block 267

City and County: San Francisco

Project Description: Demolition of three-story (plus basement) concrete, 196-space valet parking garage. Contruction of a 376-foot-tall, 27-story (plus basement) building with about 147,700 gross sq.ft. (gsf) office; 2,500 gsf retail; and 100 valet parking spaces and one truck loading space.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Please see attached Initial Study

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Initial Study 235 PINE STREET 84.432E

I. PROJECT DESCRIPTION

The proposed project would be the demolition of a three-story (plus basement) concrete parking garage (the only building on-site) and construction of a 376-ft.-tall, 27-story (plus basement) office building. The new building would include mechanical basement space, a ground-floor lobby with retail space, a service level, six floors of parking, 18 floors of office space and a mechanical penthouse. The project would include about 147,700 gross square feet (gsf) of office and 2,500 gsf of ground floor retail space, where there is now none, and 32,600 gsf of parking (about 100 valet spaces) excluding entry and exit ramps compared with the existing 20,000 gsf (about 196 valet spaces on three levels, including the roof). Vehicle access would be from Pine St. A second-floor service level would contain a truck-loading space and valet parking drop-off. Parking would be provided on floors three through eight. The Floor Area Ratio of the project would be about 14.5:1. The project would use about 55,700 gsf of transferred development rights (TDR).

The project sponsor is London & Edinburgh Trust (LFT). The project architect is Skidmore, Owings & Merrill, San Francisco. Project plans are on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St., San Francisco.

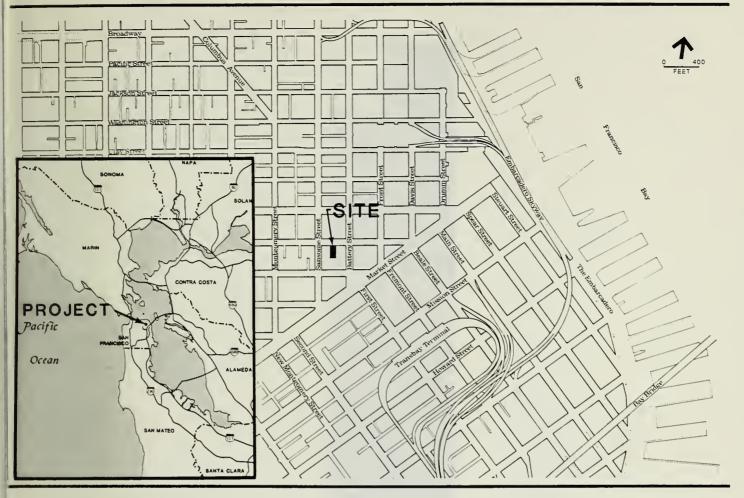
The 10,220-sq.-ft. project site is Lot 15 of Assessor's Block 267. The site fronts Pine St. between Battery and Sansome Sts. in the Financial District, within the C-3-0 (Downtown Office) Use District (see Figure 1) and a 450-S Height and Bulk District. The basic allowable Floor Area Ratio is 9:1.

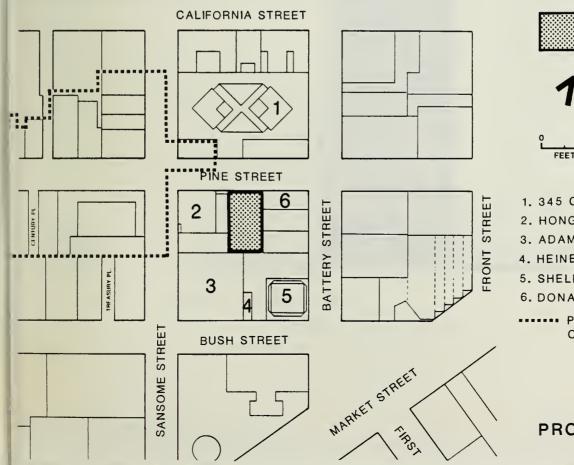
Adjacent to the site on the east are the six-story Donahoe Building, a four-story structure and a three-story structure. The 29-story Shell Building and the 14-story Adam Grant Building abut the site to the south. The 16-story Hong Kong Bank building and a six-story building abut the site on the west. All are office-retail buildings. The 47-story 345 California St. office and hotel development is under construction across Pine St. from the project site on the north.

The Pine St. elevation of the proposed project is shown in Figure 2, p 3.

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235 Pine Street : initial study / 1985.







PROJECT SITE

(Assessor's Block 267, Lot No.15)



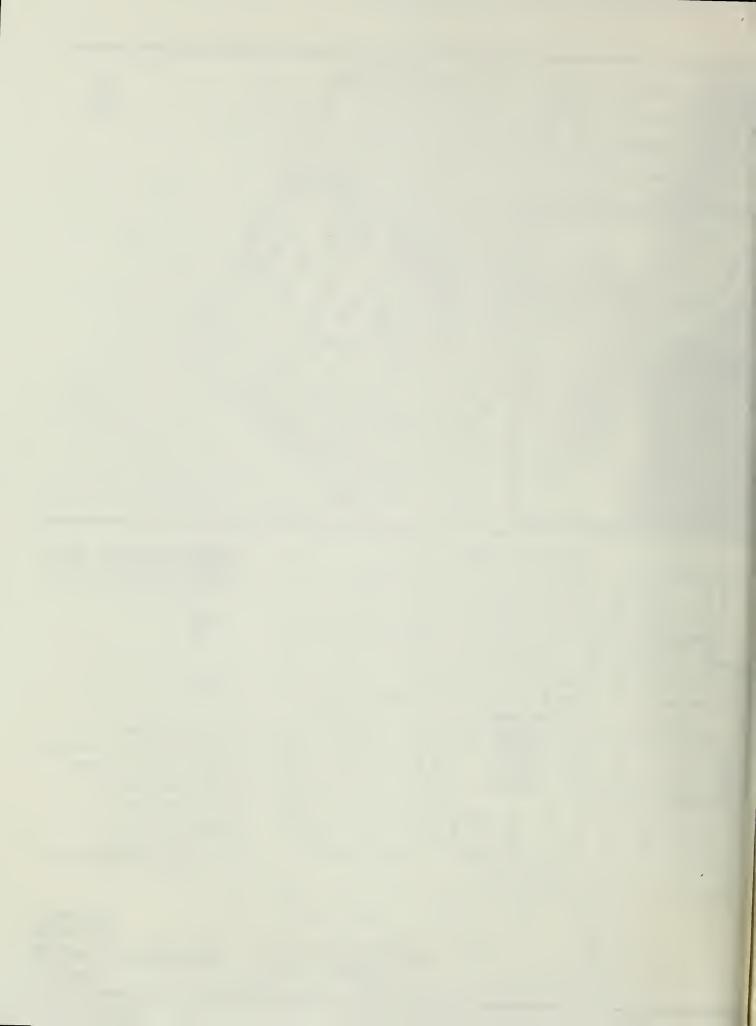


- 1. 345 CALIFORNIA
- 2. HONG KONG BANK BUILDING
- 3. ADAM GRANT BUILDING
- 4. HEINEMAN BUILDING
- 5. SHELL BUILDING
- 6. DONAHOE BUILDING

--- PINE/SANSOME CONSERVATION DISTRICT

FIGURE 1 **235 PINE** PROJECT LOCATION

SOURCE: ESA



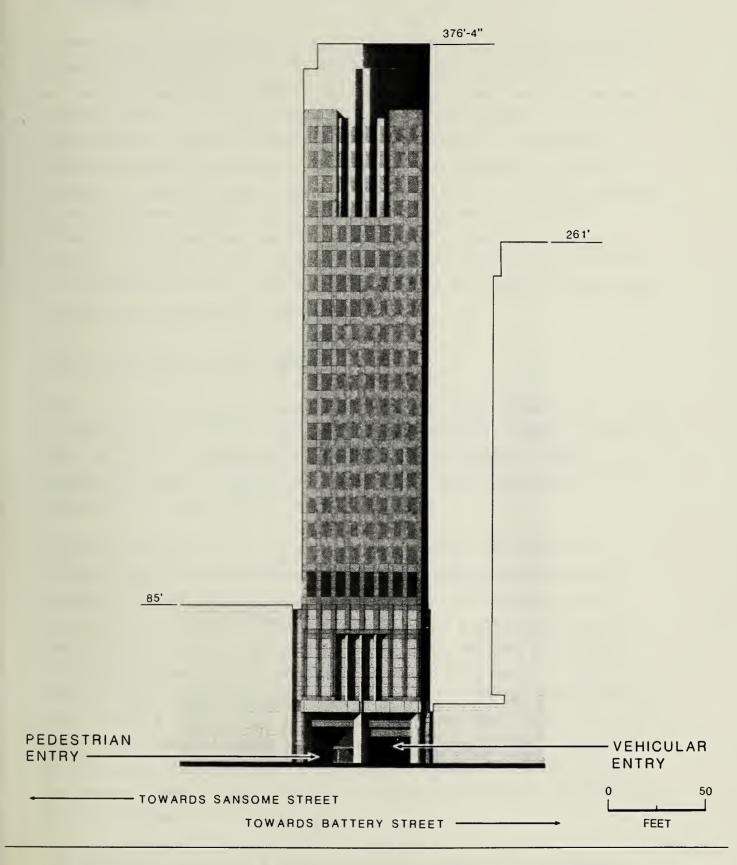


FIGURE 2 235 PINE PINE STREET ELEVATION

SOURCE: SKIDMORE, OWINGS & MERRILL

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II. INTRODUCTION

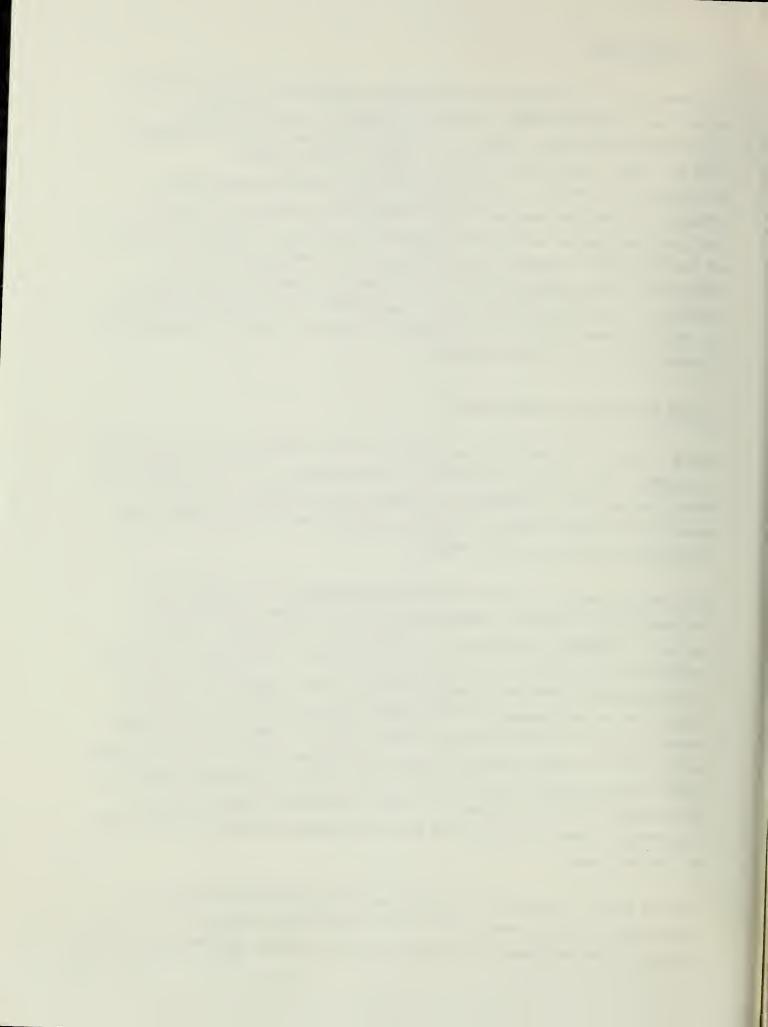
A tiered EIR will be prepared for the proposed 235 Pine St. project pursuant to Sections 21093 and 21094 of the Public Resources Code, California Environmental Quality Act (CEQA). The EIR will be tiered from the Downtown Plan EIR (EE81.3, certified October 18, 1984) and will analyze project-specific impacts. The EIR will discuss potentially significant effects that were not examined in the Downtown Plan EIR and will include applicable mitigation measures for site specific effects. Cumulative impacts of the development forecast in the C-3 districts to the year 2000 are addressed in the Downtown Plan EIR. That cumulative analysis will not be repeated in the EIR for this project. The Downtown Plan EIR may be examined at the Department of City Planning, 450 McAllister St.; the San Francisco Main Library; and various branch libraries.

Tiered Environmental Impact Report

Where a prior environmental impact report has been prepared and certified for a program, plan, policy or ordinance, the lead agency for a later project that meets the specified requirements is required (as of January 1, 1986) to examine significant effects of the later project upon the environment, with exceptions, by using a tiered report.

Agencies are required to tier EIR's which they prepare for separate but related projects including general plans, zoning changes and development projects, in order to avoid repetitive discussions of the same issues in successive EIR's and ensure that EIR's prepared for later projects which are consistent with a previously approved policy, plan, program, or ordinance concentrate on environmental effects which may be mitigated or avoided in connection with the decision on each later project. Tiering is appropriate when it helps a public agency to focus on the issues ripe for decision at each level of environmental review and in order to exclude duplicative analysis of environmental effects examined in previous environmental impact reports. Environmental impact reports shall be tiered whenever feasible, as determined by the lead agency.

The law directs that where a prior EIR has been prepared and certified as noted above, the lead agency shall examine significant effects of the later project on the environment by using a tiered EIR, except that the report on



the later project need not examine those effects which were either mitigated or avoided as a result of the prior EIR, or, examined at a sufficient level of detail in the prior EIR to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.

The Initial Study is to assist the lead agency in making the determinations required for tiering.

III. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

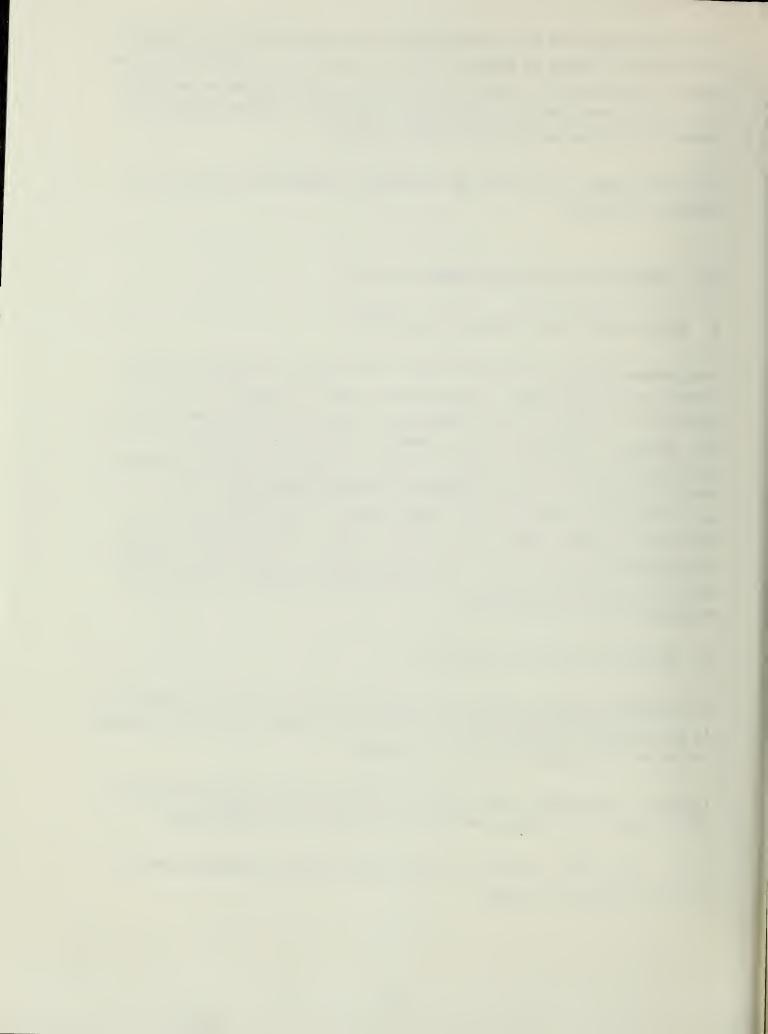
The proposed project is examined in this Initial Study to identify potential effects on the environment. The cumulative impacts of growth in the C-3 districts to the year 2000 were adequately analyzed in the Downtown Plan EIR. That analysis of cumulative impacts remains current and valid and the determination during certification of that EIR regarding significant effects remains unchanged. Some project-specific potential effects have been determined to be potentially significant, and will be analyzed in an environmental impact report (EIR). They include: the relationship of the proposed building to the Master Plan; visual quality; urban design; shadows; wind; localized transportation; traffic-generated air quality effects; and cultural resources (archaeology).

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential impacts were determined either to be insignificant or to be mitigated through measures included in the project. These items require no further environmental analysis in the EIR:

<u>Land Use</u>: The project would replace a three-story valet parking garage with office, retail and parking uses similar to those in the project area.

Glare: The project would not be faced in any reflective materials (see the mitigation measure on p. 25).



<u>Population</u>: The project would comply with the Office Affordable Housing Production Program ordinance. Cumulative and indirect effects including those of the project are addressed in the EIR prepared for the Downtown Plan.

<u>Noise</u>: After completion, building operation and project-related traffic would not perceptibly increase noise levels in the project vicinity. Operational noise would be regulated by the San Francisco Noise Ordinance, and the project would conform to the Noise Guidelines of the Master Plan.

The project would include piledriving and other noise-producing construction activities. This noise effect would be limited in duration, and the project would include measures (such as predrilling pile holes and restricting hours of piledriving; see p. 25) to reduce noise impacts from construction activities.

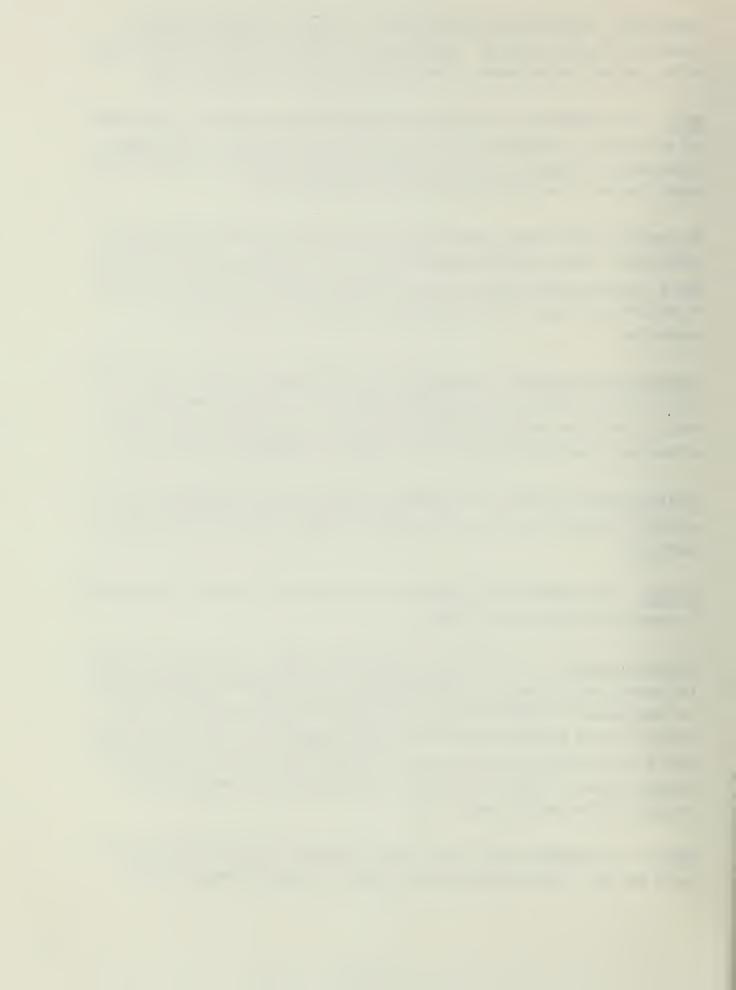
<u>Construction Air Quality</u>: Construction of the project would have short-term effects on air quality in the project vicinity. A mitigation measure to reduce particulate and hydrocarbon emissions generated during construction activities to insignificant level is included in the project (see p. 26).

<u>Utilities/Public Services</u>: The proposed project would increase demand for <u>utilities</u> and public services, but would not require additional personnel or equipment.

<u>Biology</u>: The proposed project would not affect plants or animals, as the site is completely covered by buildings.

Geology/Topography: A preliminary geotechnical report has been prepared for the project and a final detailed geotechnical report would be prepared prior to commencement of construction by a California-licensed engineer. The project sponsor and contractor would follow recommendations made in the final report regarding any excavation and construction on the site. A measure to mitigate potential impacts associated with excavation and dewatering is included in the project (see p. 26).

<u>Water</u>: The proposed project would use an average of about 9,150 gallons of water per day. The project would not affect drainage patterns or water



quality because the site is entirely covered by impermeable surfaces. See also the mitigation measure discussed above regarding excavation and dewatering.

Energy: The project would be designed to surpass performance standards of Title 24 of the California Administrative Code. Its annual energy budget would be about 123,000 Btu per sq. ft. Peak electrical energy use would coincide with PG&E's systemwide peaks; peak natural gas use would not coincide with PG&E's systemwide peak. Cumulative and indirect effects including those of the project are addressed in the EIR prepared for the Downtown Plan. Energy mitigation measures would be included as part of the project (see p. 27).

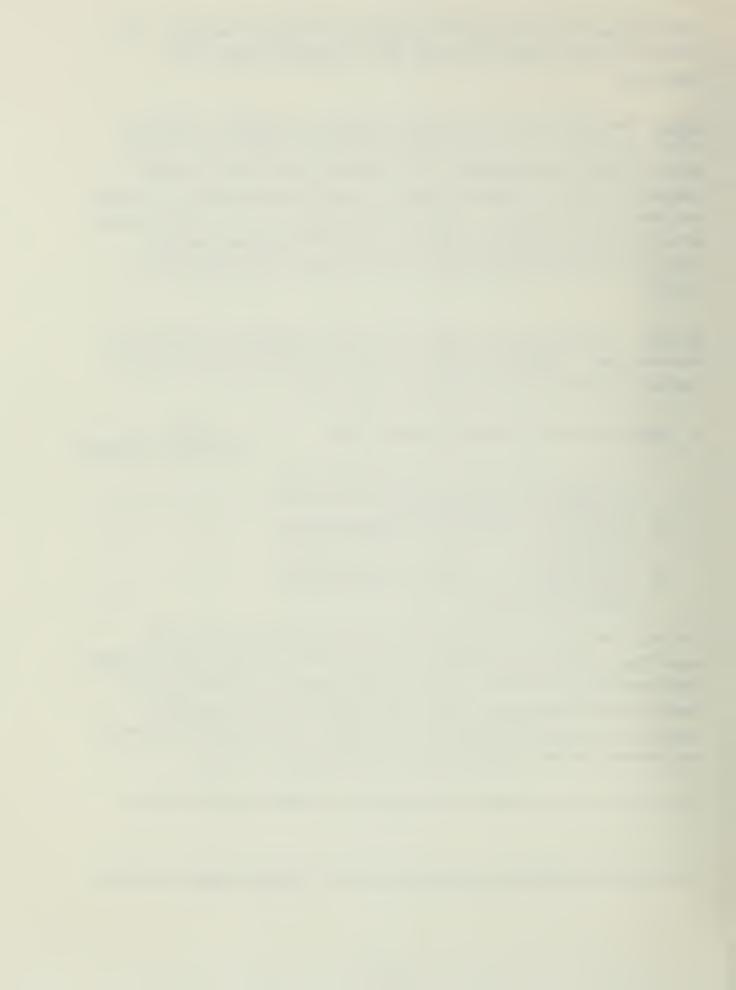
<u>Hazards</u>: The project would neither cause health hazards, nor be affected by hazardous uses. Mitigation measures to reduce any conflicts with the City's Emergency Response Plan are included in the project.

Α.	COMP	ATIBILITY WITH EXISTING ZONING AND PLANS	Not Applicable	Discussed
	1.	Discuss any variances, special authorization, or changes proposed to the City Planning Code		
	+2	or Zoning Map, if applicable.		<u>X</u>
	^2.	Discuss any conflicts with the Comprehensive Plan of the City and County of San Francisco, if applicable.		X
	*3.	Discuss any conflicts with any other adopted environmental plans and goals of the City or		
		Region, if applicable.		X

The project would be consistent with the Downtown Plan (with allowable exceptions -- see below) and the zoning for the site, and would thus meet this requirement for a tiered EIR. The project may require exceptions to the Downtown Plan Planning Code, under Section 309 of the Code, regarding separation of towers, and wind comfort criterion. The project's relation to the Downtown Plan and Planning Code will be discussed in the EIR.

The project would not conflict with adopted environmental plans or goals.

^{*} Derived from State EIR Guidelines, Appendix C, normally significant effect.



B. ENVIRONMENTAL EFFECTS

Yes No Discussed

1. Land Use. Could the project:

*a. Disrupt or divide the physical arrangement
of an established community?

b. Have any substantial impact upon the
existing character of the vicinity?

X X

The project site is located in San Francisco's Financial District, an area characterized by office buildings of various ages and sizes. Upper floors of structures are generally office with ground floor banking and office support retail facilities. The project would be an infill office project, replacing a three-story valet parking garage.

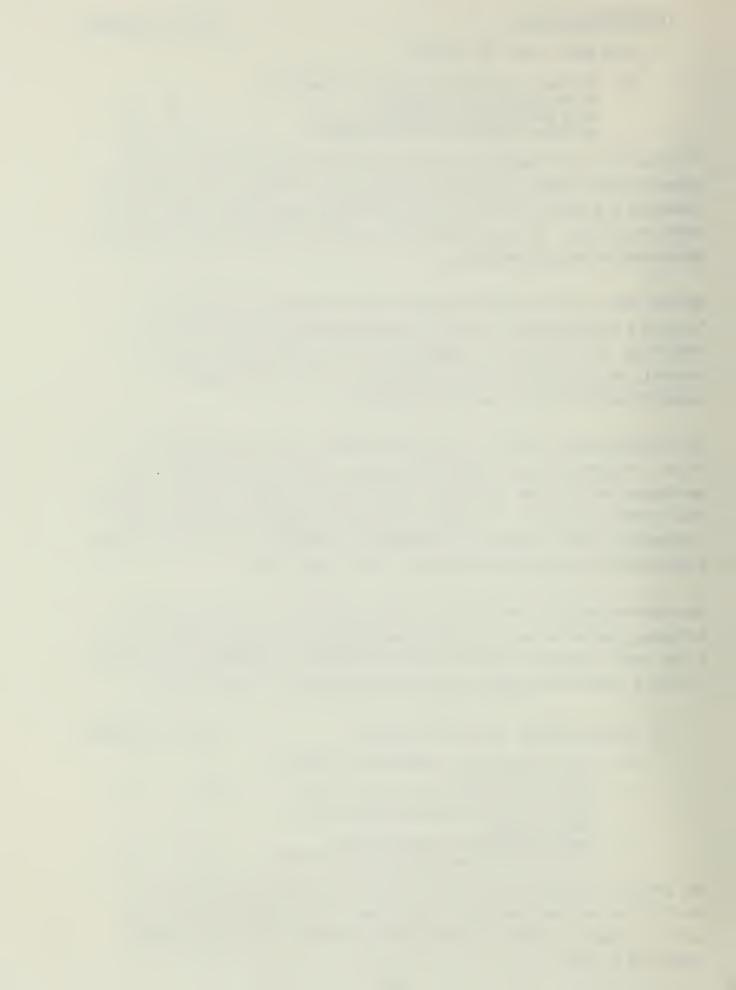
Section 210.3 of the City Planning Code states that the C-3-0 District, "playing a leading role in finance corporate headquarters and service industries, and serving as an employment center for the region, consists primarily of high quality office development." The project would be compatible with the C-3-0 land use designation.

On the north across Pine St. is the Dollar Block, or 345 California St. project (formerly known as 333 California St., EE81.249 and 84.565E); this development will include new office, retail and hotel uses, and also renovated older office structures. The 345 California St. project is currently under construction, and is scheduled for completion in February, 1986. The proposed project would be consistent with uses in the project area.

The replacement by the project of a parking garage with a mixed-use office building, similar in use and scale to development on the block and buildings in the area, would not disrupt or divide the physical arrangement of the area or have a substantial impact on the existing character of the vicinity.

2.	Visu	al Quality. Could the project:	<u>Ye s</u>	No	Discussed
		Have a substantial, demonstrable negative aesthetic effect? Substantially degrade or obstruct any scenic view or vista now observed from	<u> </u>		<u>X</u>
	c.	public areas? Generate obtrusive light or glare substantially impacting other properties?	_	X	<u>X</u>

The project's appearance and possible effects on views will be discussed in the EIR. Reflective glass would not be used in the project; the building would not result in glare affecting other properties. See the mitigation measure on p. 25.



3.	Population. Could the project:	Yes No Discussed
	*a. Induce substantial growth or concentration of population?*b. Displace a large number of people	<u> </u>
	(involving either housing or employment)?c. Create a substantial demand for additional housing in San Francisco,	<u> </u>
	or substantially reduce the housing supply?	<u> </u>

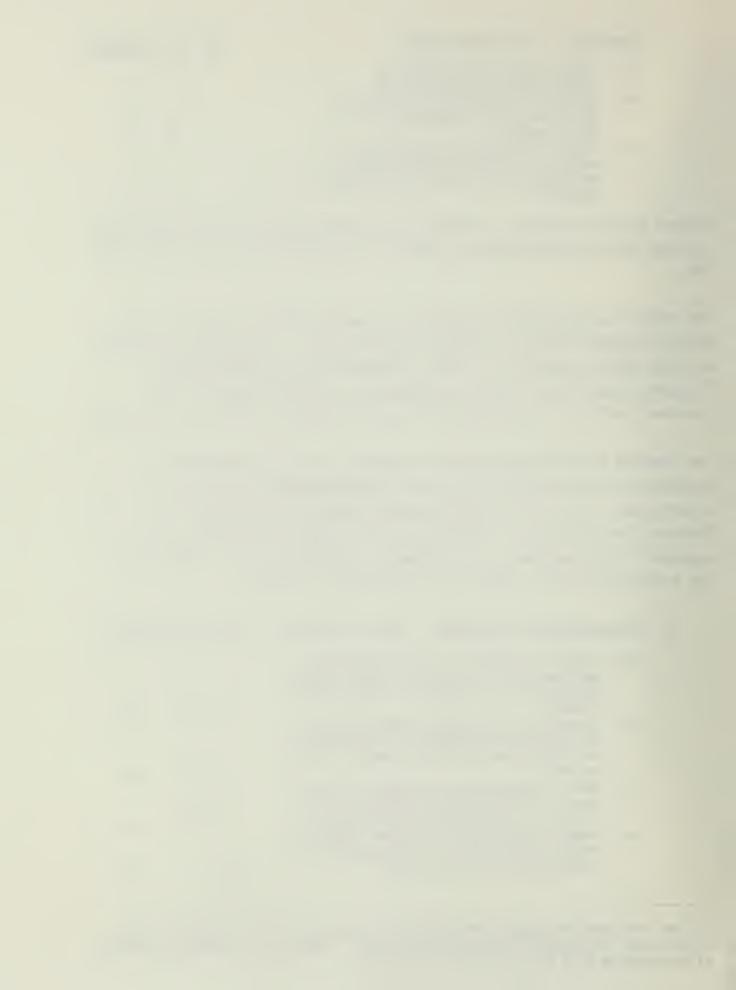
Project specific employment information regarding number and type of employees on site, with existing conditions and with the project will be included in the EIR.

The project would generate a demand for 57 dwelling units according to the Office Affordable Housing Production Program formula. The project must comply with the OAHPP, Ordinance No. 358-85. Cumulative and indirect effects including those of this project are addressed, and may be found in, the Downtown Plan EIR. That analysis will not be repeated in the 235 Pine St. EIR.

The Downtown Plan EIR concluded that population effects resulting from development in the C-3 districts under the Downtown Plan would not be significant. That conclusion would remain true with the project. The Downtown Plan EIR (EE81.3, Final EIR certified October 18, 1984) may be examined at the Department of City Planning, 450 McAllister St., 6th Floor; the San Francisco Main Library and various branch libraries.

4.	Tran	sportation/Circulation. Could the project:	Yes No Disc	ussed
	*a.	Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	X**	X
	b.	Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic		
	c.	hazards? Cause a substantial increase in transit demand which cannot be accommodated by	<u></u> ^^^	
	d.	existing or proposed transit capacity? Cause a substantial increase in parking	<u>X*</u> *	
		demand which cannot be accommodated by existing parking facilities?	<u>x</u>	<u> </u>

^{**} The site specific impacts created by this project are not expected to be significant, as noted in the discussion below. However, the localized effects of the project will be discussed in the EIR.



The project would decrease the number of parking spaces on the site by about one-half, from 196 to 100 spaces, and, therefore, localized traffic impacts from the project are not expected to be worse with the project than with existing conditions. However, the localized transportation impacts of the project will be analyzed in the EIR.

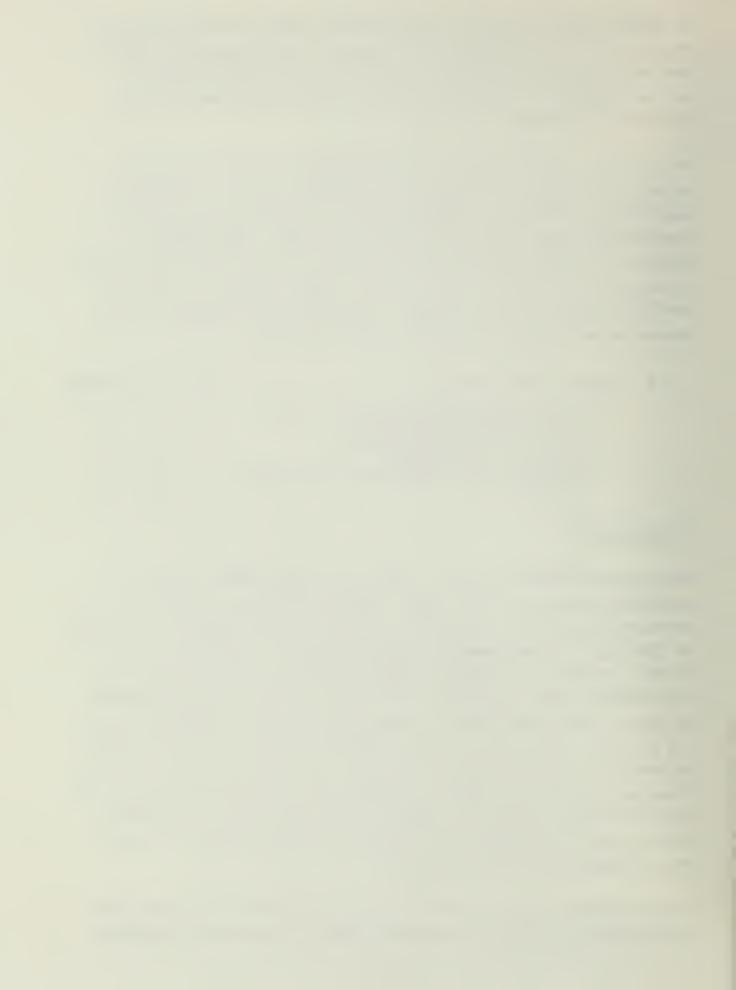
The cumulative transportation effects of development in the C-3 districts including the project are analyzed in the Downtown Plan EIR. The Planning Commission in certifying the Downtown Plan EIR determined that cumulative transportation impacts would have a significant impact. The cumulative analysis in the Downtown Plan regarding transportation will be incorporated by reference into the 235 Pine St. EIR, and the project effects in relation to cumulative impacts will be discussed. The analysis in the Downtown Plan EIR remains current regarding future and project conditions.

5.	Noise. Could the project:	Yes	No	Discussed
	*a. Increase substantially the ambient noise levels for adjoining areas?		X	X
	b. Violate Title 25 Noise Insulation Standards, if applicable?		X	
	c. Be substantially impacted by existing noise levels?		X	

Project Operation

The noise environment of the site, like all of downtown San Francisco, is dominated by vehicular traffic noise. The Downtown Plan EIR indicates a day-night average noise level (Ldn) of 75 dBA on Pine St. adjacent to the site in 1984./1,2/ The Environmental Protection Element of the Master Plan contains guidelines for determining the compatibility of various land uses with different noise environments. For office uses the guidelines recommend no special noise control measures in an exterior noise environment up to an Ldn of 70 dBA. For noise levels of 75 dBA and above the guidelines recommend an analysis of noise reduction requirements and inclusion of noise insulation features in the building design. The project sponsor has indicated that noise insulation measures would be included as part of the design if recommended (see p. 25). The proposed structure would not include housing, so Title 25 Noise Standards would not be applicable.

Project operation would not result in perceptibly greater noise levels than those existing in the area. The amount of traffic generated by the project



during any hour of the day, and cumulative traffic increases at the time of project completion, would cause traffic noise levels to increase by one dBA or less. To produce a noticeable increase in environmental noise, a doubling of existing traffic volume would be required; traffic increases of this magnitude would not occur with anticipated cumulative development including the project./3/

Project Construction

Project construction would take place over about 20 months, and would increase noise levels in surrounding areas. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers between noise source and listener.

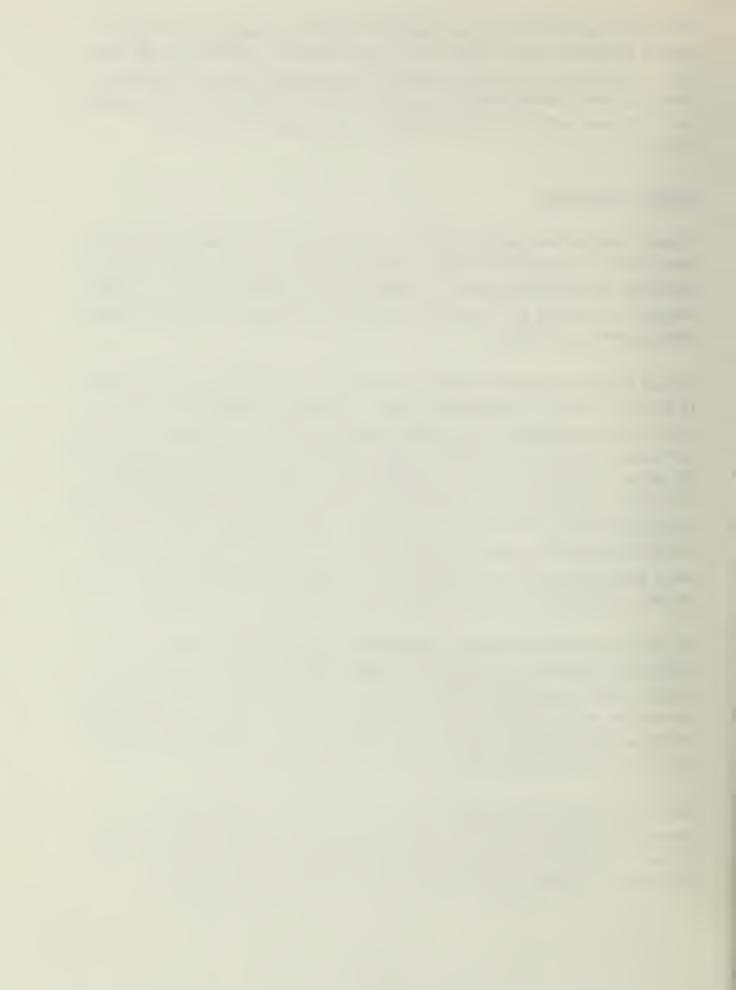
Typical construction noise levels, other than for pile driving range from 78 to 89 dBA at 50 ft. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the City Police Code). The ordinance requires that sound levels of construction equipment other than impact tools not exceed 80 dBA at a distance of 100 ft. from the source. Impact tools (jackhammers, piledrivers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work at night, from 8:00 p.m. to 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

The project would be required to comply with the San Francisco Noise Ordinance, San Francisco Police Code Section 2909, "Fixed Source Noise Levels," which regulates mechanical equipment noise. The project site and surrounding area are within a C-3-0 district. In this district, the ordinance limits equipment noise levels at the property line to 70 dBA between 7 a.m. and 10 p.m. and 60 dBA between the hours of 10 p.m. and 7 a.m.

The project would require about three to four weeks of piledriving.

Conventional unmuffled and unshielded piledrivers emit noise levels of 100 to
110 dBA at a distance of 50 ft. each time the driver strikes the pile. The

Department of Public Works allows piledriving operations under certain



conditions, which may include specifying relatively quiet equipment, predrilling pile holes, and/or specifying hours of operation to reduce the number of people exposed to noise effects.

In buildings across Pine St. which have operable windows, noise levels could reach as high as 95 dBA with the windows open and 85 dBA with the windows closed during piledriving. For buildings adjacent to the project site, piledriving noise could reach as high as 90 dBA inside the buildings. Adjacent and nearby buildings would also experience vibrations from piledriving. These vibrations have been found to be more disturbing to some people than high noise levels.

Nearly all of the structures in the project vicinity are office buildings (many with operable windows). The 345 California St. building is scheduled for completion in February 1986; construction activities on the project site could disturb residents in the proposed hotel atop 345 California St. The sponsor would coordinate the hours of pile driving with the Department of Public Works; pile driving would be limited to result in least disturbance to neighboring uses (see mitigation measure, p. 25). Pile holes would be predrilled, which would reduce the duration of piledriving activities. Other measures are also included in the project to reduce construction noise (see p. 25). Noise from project operation and construction will not be discussed in the EIR.

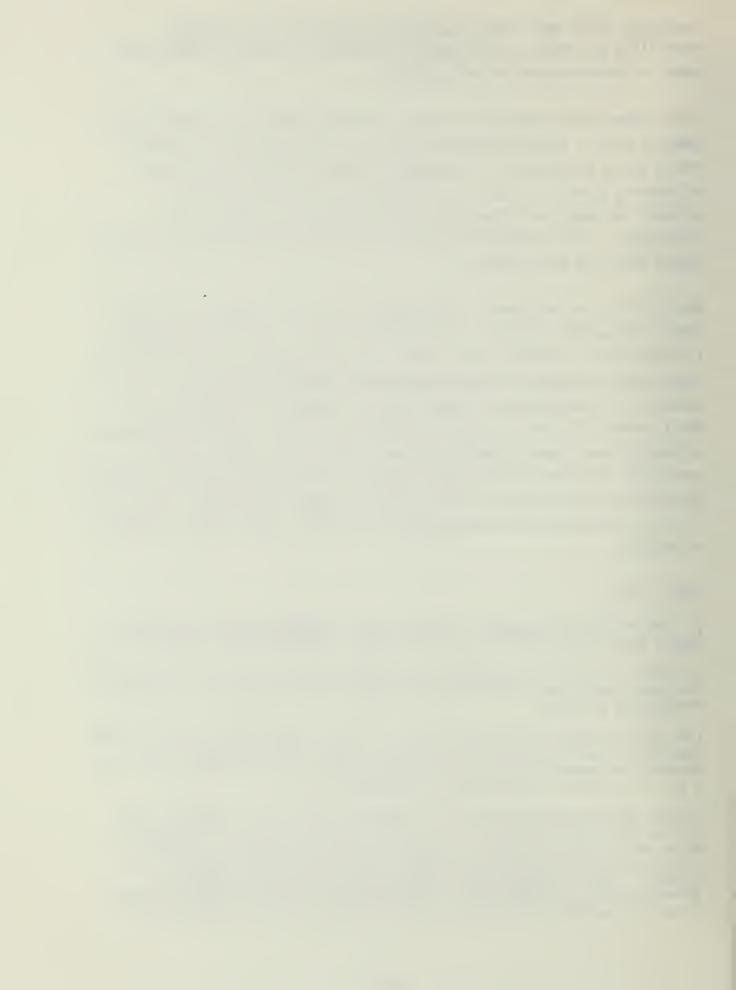
NOTES - Noise

/1/ San Francisco Department of City Planning, <u>Downtown Plan Environmental</u> <u>Impact Report (EIR)</u>, EE81.3, certified October 18, 1984, Vol. 1, Table IV.J.2.

/2/ dBA is a measure of sound in units of decibels (dB). The "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound.

Ldn, the day-night average noise level, is a noise measurement based on human reaction to cumulative noise exposure over a 24-hour period, taking into account the greater annoyance of nighttime noises; noise between 10 p.m. and 7 a.m. is weighted 10 dBA higher than daytime noise.

/3/ See Downtown Plan EIR (EE81.3) Continuous Section IV.E. generally and Section IV.J., pp. IV.J.8-18. Increases of 1 dBA or less in environmental noise are not noticeable by most people outside a laboratory situation (National Academy of Sciences, Highway Research Board, Rsch. Rpt. No. 117 (1971)). (See also FHWA Highway Traffic Noise Prediction Model, Rpt. #FHWA-RD-77-108, December 1978, p. 8, regarding doubling of traffic volumes producing increases of 3 dBA or more, which are noticed by most people.)



X X

6. Air Quality/Climate. Could the project:

either in the community or the region?

*a.	Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	χ**	X
*b.	Expose sensitive receptors to substantial pollutant concentrations?	<u></u>	<u>~</u>
c.	Permeate its vicinity with objectionable odors?	X	- ~
	Alter wind, moisture or temperature (including sun shading effects), so as to substantially affect public areas, or change the climate		

Demolition, grading and other construction activities would temporarily affect local air quality for about 20 months, causing a temporary increase in particulate dust and other pollutants. Dust emissions during demolition and excavation would increase particulate concentrations near the site. Dustfall can be expected at times on surfaces within 200 to 800 ft. Under high winds exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed primarily of large particles that settle out of the atmosphere more rapidly with increasing distance from the source. More of a nuisance than a hazard for most people, this dust could affect persons with respiratory diseases as well as sensitive electronics or communication equipment. The project sponsor would require the contractor to wet down the construction site twice a day during construction to reduce particulates by at least 50% (see p. 26).

Diesel-powered equipment would emit, in decreasing order by weight, nitrogen oxides, carbon monoxide, sulfur oxides, hydrocarbons, and particulates. This would increase local concentrations temporarily but would not be expected to increase the frequency of exceedances of air quality standards. The project sponsor would require the project contractor to maintain and operate construction equipment in such a way as to minimize exhaust emissions (see p. 26). Construction air quality effects require no further analysis.

The cumulative effects on air quality of traffic emissions from traffic generated by development in the C-3 districts including the project are analyzed in the Downtown Plan EIR. The Planning Commission in certifying the Downtown Plan EIR determined that cumulative air quality impacts would have a significant impact. The cumulative analysis in the Downtown Plan EIR regarding air quality will be incorporated by reference and the project effect in relation to cumulative effects will be discussed. The analysis and conclusions of the Downtown Plan EIR remain current regarding future and project conditions.



The shadow effects of the project will be discussed in the EIR./1/

Section 148 of the Planning Code establishes comfort criteria of 11 mph equivalent wind speed for pedestrian areas and 7 mph for seating areas, not to be exceeded more than 10% of the time, year-round between 7:00 a.m. and 6:00 p.m. In order to determine the wind effects of the project and its compliance with the Downtown Plan wind criteria, wind tunnel tests were conducted./2/ The analysis of project wind effects will be summarized in the project EIR.

NOTES - Air Quality/Climate

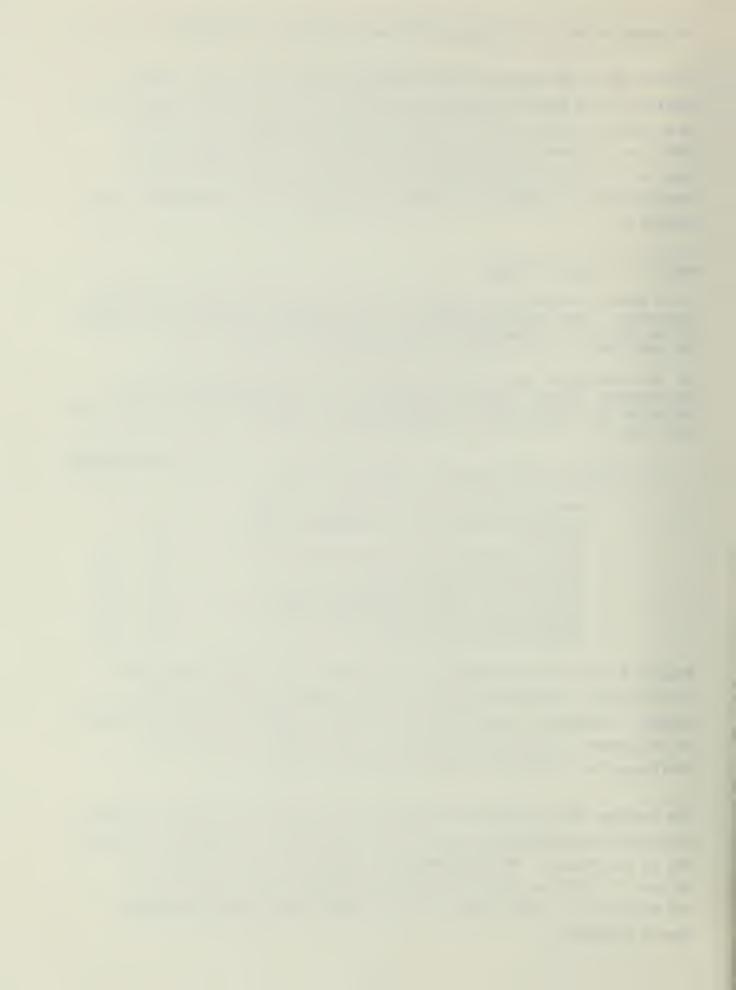
/1/ A shadow analysis was prepared for the project by Environmental Science Associates. These shadow diagrams are on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St., Sixth Floor, San Francisco, CA 94102.

/2/ The wind tunnel analysis was prepared by B. R. White, Ph.D for Environmental Science Associates, and is on file and available for public review at the Office of Environmental Review, Department of City Planning, 450 McAllister St., Sixth Floor, San Francisco, CA 94102.

7.	Utili	ties/Public Services. Could the project:	Yes	No	Discussed
	*a.	Breach published national, state or local standards relating to solid waste or litter control?		X	
	*b.	Extend a sewer trunk line with capacity to			
		serve new development?		<u>X</u>	<u>X</u>
	с.	recreation or other public facilities?		_X	<u> x</u>
	d.	Require major expansion of power, water, or communications facilities?		<u>X</u>	<u> x</u>

Providers of utilities and public services have been contacted and have indicated that existing capacities are adequate to serve the proposed project. Statements from utility providers are available for public review at the Department of City Planning, Office of Environmental Review, 450 McAllister St., Sixth Floor, San Francisco, CA 94102.

The Downtown Plan EIR concluded that demand for utilities and public services resulting from development in the C-3 districts under the Downtown Plan would not be significant. The Downtown Plan EIR (EE81.3, Final EIR certified October 18, 1984) may be examined at the Department of City Planning, 450 McAllister St., 6th Floor; the San Francisco Main Library and various branch libraries.



8. Biology. Could the project:

*a. Substantially affect a rare or endangered species of animal or plant or the habitat of the species?

*b. Substantially diminish habitat for fish, wild-life or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?

C. Require removal of substantial numbers of mature, scenic trees?

X

Yes No Discussed

The site is covered by impervious surfaces. The project would not affect plant or animal habitats. This topic will not be discussed in the EIR.

9.	Geo10	gy/Topography. Could the project:	<u>Yes</u>	No	Discussed
	*a. b.	Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)? Change substantially the topography or any		<u>X</u>	<u> </u>
		unique geologic or physical features of the site?		X	

The project site is at five ft., San Francisco City Datum (SFD)./1/ Soils at the site are composed of primarily clayey sand fill and dune sand, loose to medium-dense with rubble (approximately 22 ft.), underlain by 15 ft. of Bay Mud and 30 ft. of silty sand. Beneath this is a 20 ft. layer of very stiff upper Old Bay Clay, 10 ft. of clayey and silty sand and 40 ft. of very stiff lower Old Bay Clay and about 80 ft. of very dense clayey sand and very stiff silty clay. Shale bedrock (Franciscan Formation) is located about 215 ft. below grade. Groundwater levels are expected to be about eight to ten ft. SFD./2/

Excavation for the project foundation and basement would be conducted to a depth of about nine ft. SFD. The existing basement is at about eight ft. SFD. The project would have a pile foundation; piles would be driven about 42 to 47 ft. into dense, load-bearing sands. Excavation depth would approach the groundwater level, and dewatering might be required, especially in the area of pile caps. Dewatering could produce some local subsidence, which could damage the streets or older buildings in the site's immediate vicinity. The project would include measures to mitigate this potential impact (see p. 26).



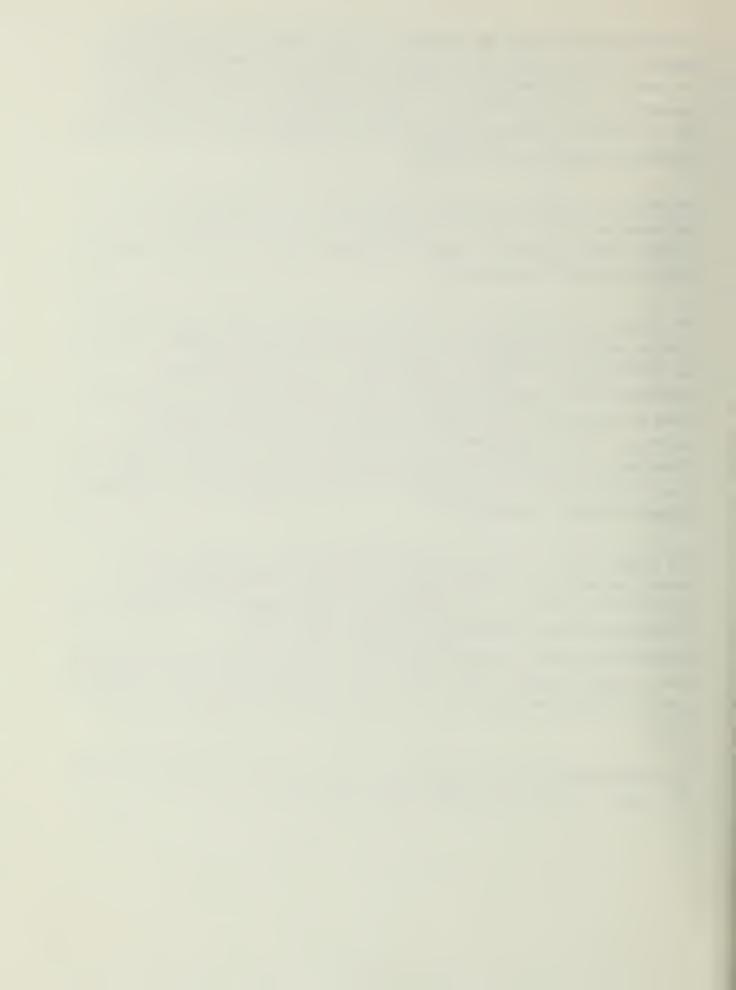
Pit walls would be shored up to prevent lateral movement during excavation. Adjacent structures might need to be underpinned, should excavation go below the base of their foundations, to avoid such damage as cracking of walls or foundations or sagging of floors. The building contractor must comply with the San Francisco Building Code and the Excavation Standards of the California Occupational Safety and Health Agency.

Bay mud is a low quality foundation support soil. To avoid building settlement and similar problems encountered when building on Bay mud, the project foundations would include use of piles driven to dense sands below the Bay mud to support the structures.

The closest active faults to San Francisco are the San Andreas Fault, about 9 miles southwest of Downtown, and the Hayward and Calaveras Faults, about 15 and 30 miles east of Downtown, respectively. The project area would experience Violent (Intensity Level B, fairly general collapse of brick and frame structures when not unusually strong, serious cracking of better buildings, lateral displacement of streets, bending of rails and ground fissuring) groundshaking during a major earthquake./3/ The site is within an area of liquefaction or subsidence./4/ It is not within an area of potential tsunami or seiche flooding./5/

The project sponsor would follow the recommendations of structural and foundation reports to be prepared for the project for any excavation and construction on the site. The building must meet current seismic engineering standards of the San Francisco Building Code which include earthquake-resistant design and materials. The Code is designed to allow for some structural damage to buildings but not collapse during a major earthquake (see also Mitigation Measures, p. 26, for the project's emergency response plan).

The project would not have a substantial effect on geology or topography, and this topic will not be discussed in the project EIR.



NOTES - Geology/Topography

/1/ San Francisco Datum establishes the City's "0" point for surveying purposes at approximately 8.6 ft. above mean sea level.

/2/ Preliminary Geotechnical Study for 225 Pine Street, Harding Lawson Associates, August 24, 1984. This report is available for review at the Office of Environmental Review, 450 McAllister St., San Francisco, CA 94102.

/3/ URS/John A. Blume and Associates, <u>San Francisco Seismic Safety</u>
<u>Investigation</u>, 1974. Groundshaking intensities that would result from a major earthquake were projected and classified on a five-point scale ranging from E (Weak) through A (Very Violent).

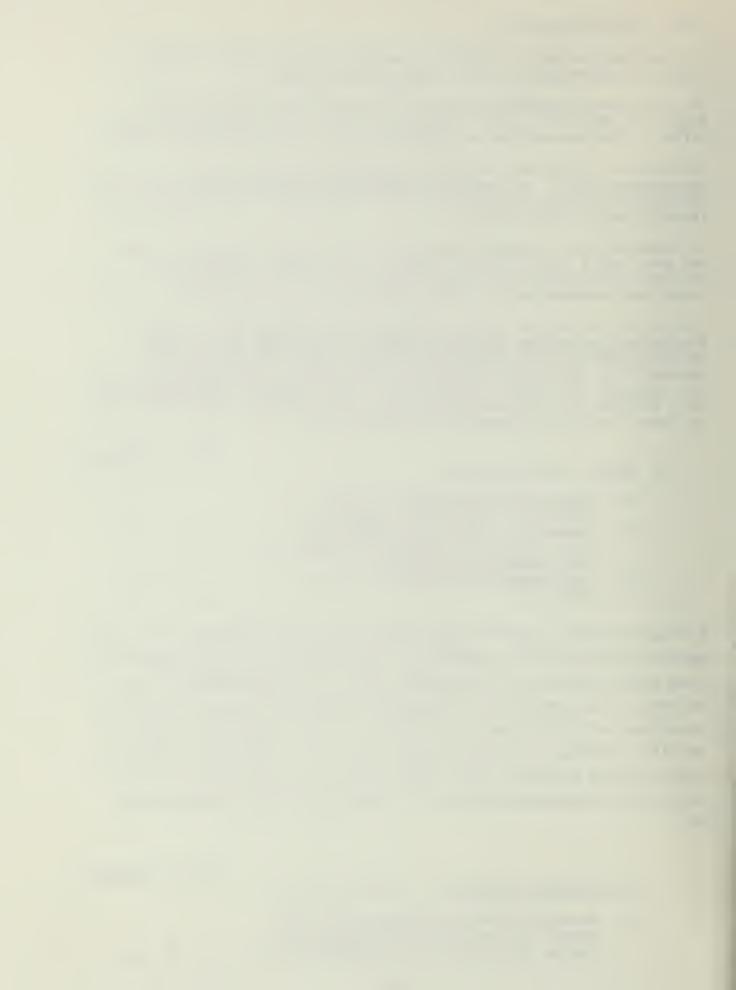
/4/ Liquefaction is the transformation of granular material, such as loose, wet sand, into a fluid-like state similar to quicksand. Subsidence is a lowering of the ground surface from settlement of fill or alluvium. This can occur from groundshaking, withdrawal of groundwater, or other causes.

/6/ A.W. Garcia and J.R. Houston, Type 16 Flood Insurance Study: Tsunami Predictions for Monterey and San Francisco Bays and Puget Sound, Federal Insurance Administration, Department of Housing and Urban Development, November 1975. Maximum flood elevations for earthquake-induced tsunamis have been estimated to be about elevation -3.5 ft. for a 100-year event and 0.5 ft. for a 500-year event (elevations from San Francisco Datum, 8.64 ft. above mean sea level), both of which would be below site grade.

10.	Water. Could the project:	<u>Yes</u>	No	Discussed
	*a. Substantially degrade water quality, or contaminate a public water supply?		_X	<u>x</u>
	*b. Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge?		_X_	<u> x</u>
	*c. Cause substantial flooding, erosion or siltation?		<u>X</u>	

As discussed above, excavation depth would approach the groundwater level, and dewatering may be required, especially in the area of pile caps. Dewatering could produce some localized subsidence which could damage streets or older buildings in the immediate site vicinity. The sponsor has agreed to measures to mitigate effects of dewatering (see p. 26). Site runoff would drain into the City's combined sanitary and storm sewage system. The project would not affect drainage patterns or water quality because the site is now entirely covered with impermeable surfaces. This topic will not be discussed in the EIR.

11.	Ener	gy/Natural Resources. Could the project:	<u>Yes</u>	No	Discussed
	*a.	Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?		X_	X



YES NO DICUSSED

b. Have a substantial effect on the potential use, extraction, or depletion of a natural resource?

<u> X</u> X

Annual electric energy consumption by the existing parking garage on the site is unknown.

Removal of existing structures would require an unknown amount of energy. Fabrication and transportation of building materials, worker transportation, site development, and building construction would require about 250 billion Btu at the source/1,2/ of gasoline, diesel fuel, natural gas and electricity./3/ Distributed over the estimated 50-year life of the project, this would be about five billion Btu per year, or about 20% of annual building energy requirements.

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Administrative Code.

Documentation showing compliance with these standards is submitted with the application for the building permit and is enforced by the Bureau of Building Inspection.

Table 1, p. 19, shows the estimated operational energy which would be used by the project. Project demand for electricity during PG&E's peak electrical load periods, July and August afternoons, would be about 1,030 kW, an estimated 0.006% of PG&E's peak load of about 16,000 MW./4/ Project demand for natural gas during PG&E's peak natural gas load periods, January mornings, would be 9.4 million Btu per day, or about 0.2% of PG&E's peak load of about 3.7 billion Btu per day./4/ Annual and peak daily electricity and natural gas consumption are shown in Figures 3 and 4, pp. 20 and 21. Measures to reduce energy consumption are included as part of the project (see p. 27).

Project-related transportation would cause additional, off-site energy consumption. Project-related trips would require about 58,000 gallons of gasoline and diesel fuel and about 0.5 million kWh of electricity annually. The total annual transportation energy demand, converted with at-source factors to a common thermal energy unit, would be about 13.3 billion Btu. This projected use is based upon the mix of highway vehicles in California in 1987. Per vehicle fuel use is expected to decrease during the next few years as the vehicle fleet becomes more efficient and fuel more expensive.

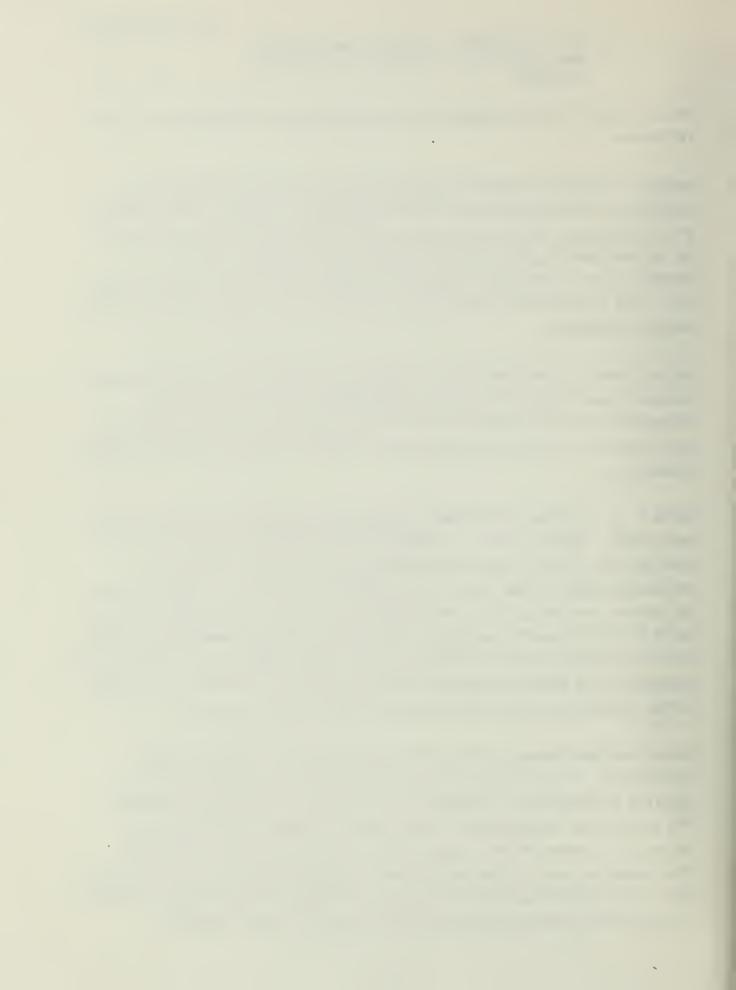


TABLE 1: ESTIMATED PROJECT ENERGY USE

Allowable Energy Budget Under Title 24

Total annual BTU/a/ per square foot of

office space

Total annual BTU per square foot of

retail space

126,000 Btu/sq. ft.

200,000 Btu/sq. ft.

Monthly Natural Gas Consumption/b/

Estimated monthly natural gas consumption

per square foot

Estimated total monthly natural gas

consumption

Estimated peak hourly natural gas

consumption

540 Btu/sq. ft.

80,500 cu ft. (90 million Btu)/month

2,060 cu. ft./hr.

Monthly Electrical Consumption/b/

Estimated monthly electrical consumption

per square foot

Estimated total monthly electrical consumption

1.2 kwh (12,286

Btu)/sq. ft

188,400 kWh (1.9 billion

Btu)

Estimated peak hourly electrical consumption

1.020 kWh

Annual Consumption

Estimated total annual natural gas consumption

Estimated total annual electrical consumption

Connected kilowatt load

Estimated total annual energy consumption

960,000 cu. ft. (1.1 billion Btu)

2.3 million kWh

(24 billion Btu)

1.030 kW

25.1 billion Btu

(4,480 barrels of oil)

/a/ Btu (British thermal unit): A standard unit for measuring heat. Technically, it is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit (251.97 calories) at sea level.

/b/ Electrical and natural gas consumption were calculated for the project by Skidmore Owings & Merrill, San Francisco. These calculations are available for review at the Office of Environmental Review, Department of City Planning, 450 McAllister St., 6th Floor, San Francisco, California.

Energy Conversion Factors: NOTE:

one gallon gasoline = 140,000 Btu

one kilowatt hour (kWh) = 10,239 Btu, assuming operational efficiency

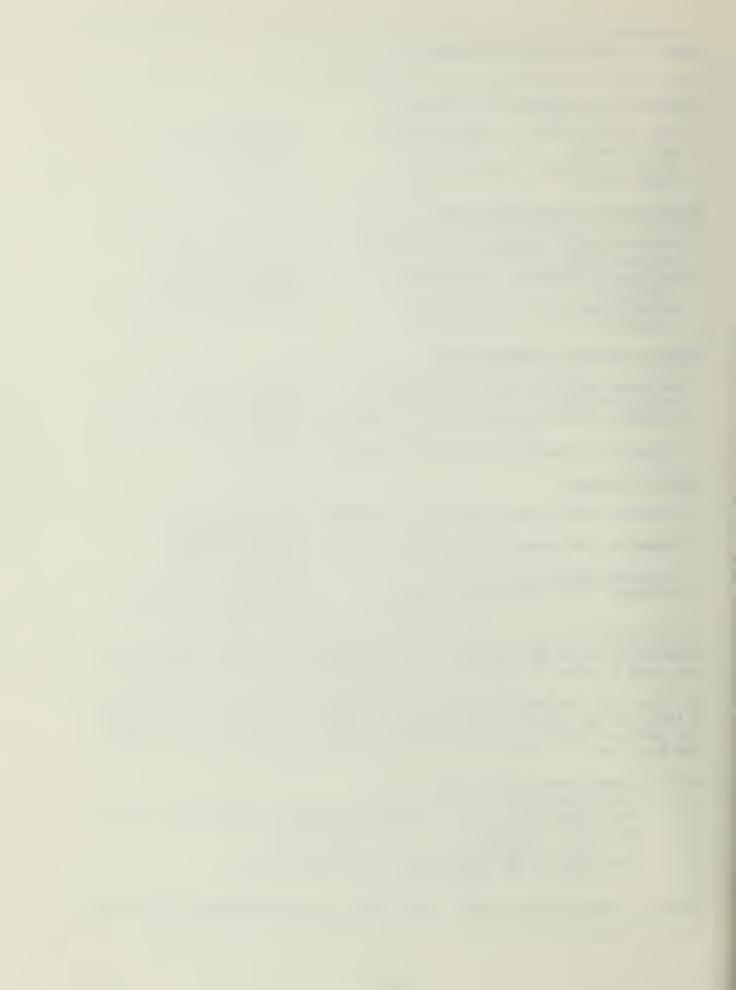
of 33% for fossil or nuclear-fueled power plant

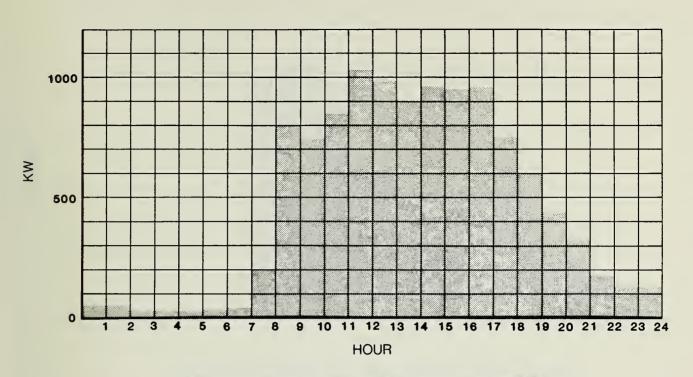
one therm = 100,000 Btu

one cubic foot of natural gas = 1,100 Btu at source

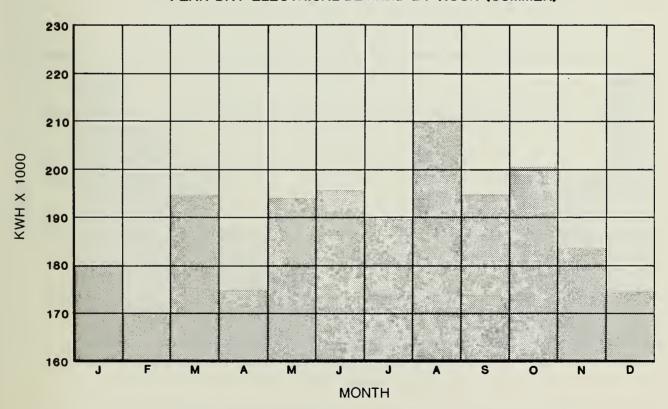
one barrel of oil = 5.6 million Btu

SOURCE: Skidmore Owings & Merrill; ESA, Inc.; and Department of City Planning.





PEAK DAY ELECTRICAL DEMAND BY HOUR (SUMMER)

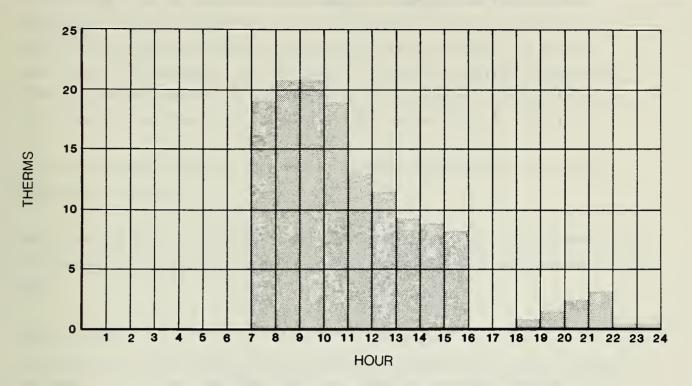


ANNUAL CONSUMPTION OF ELECTRICITY BY MONTH

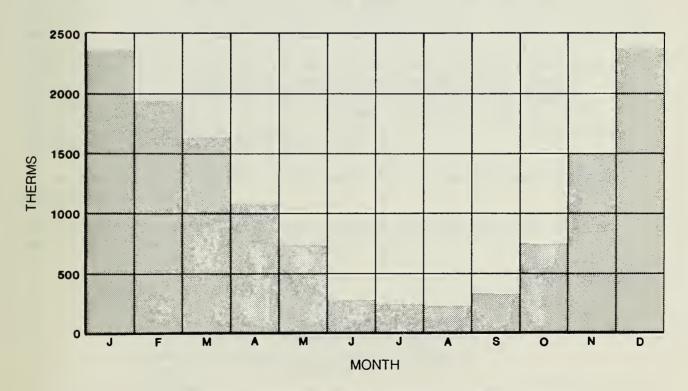
FIGURE 3
235 PINE
PROJECTED ELECTRICITY CONSUMPTION

SCIRCE: SKIDMORE, OWINGS & MERRILL





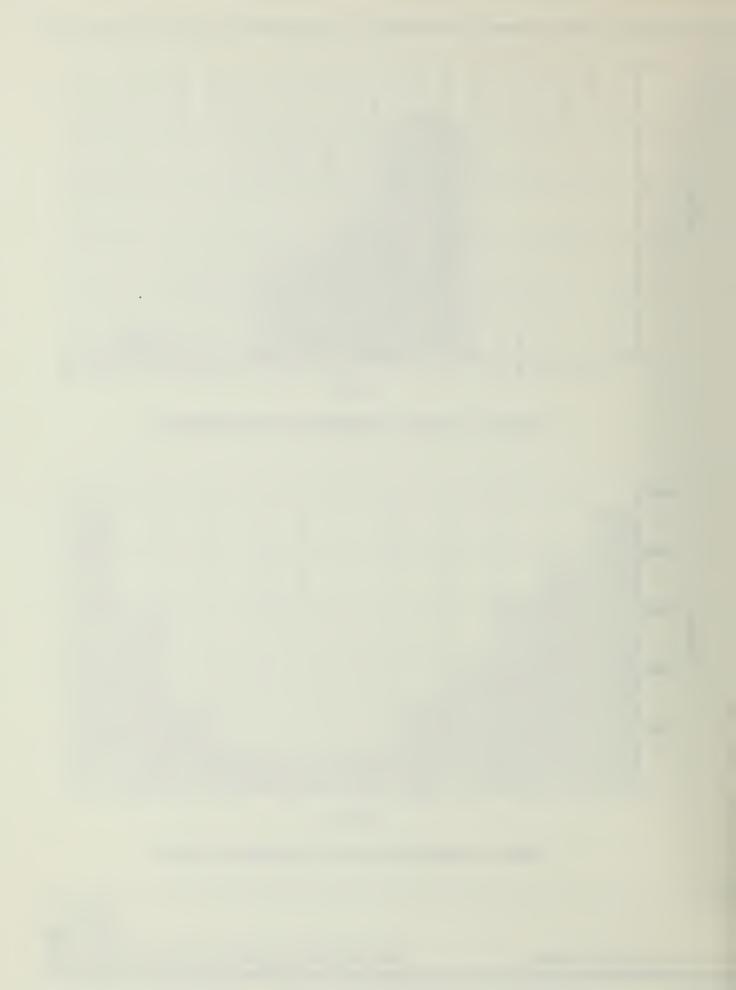
PEAK DAY NATURAL GAS DEMAND BY HOUR (WINTER)



ANNUAL CONSUMPTION OF NATURAL GAS BY MONTH

FIGURE 4
235 PINE
PROJECTED NATURAL GAS CONSUMPTION

OURCE: SKIDMORE, OWINGS & MERRILL



The Downtown Plan EIR concluded that energy consumption resulting from development in the C-3 districts under the Downtown Plan would not be significant and that conclusion remains valid for the future and project conditions. The Downtown Plan EIR (EE81.3, Final EIR certified October 18, 1984) may be examined at the Department of City Planning, 450 McAllister St., 6th Floor; the San Francisco Main Library and various branch libraries.

This topic, energy impacts, requires no further analysis and will not be discussed in the EIR.

Average water use is projected to be 9,150 gallons per day. This demand could be accommodated by existing supplies. This topic will not be discussed in the EIR.

NOTES - Energy

/1/ At-source thermal energy, given in British thermal units (Btu) is based on information received from PG&E, Technical Service Department, May 10, 1984.

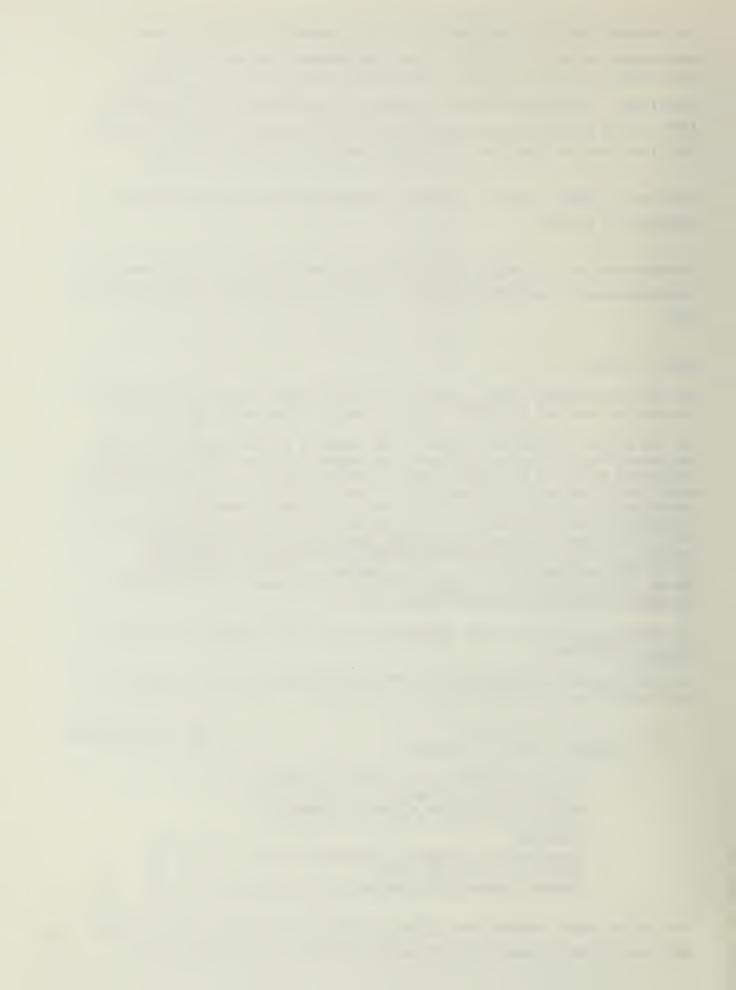
/2/ The British thermal unit (Btu) is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit at sea level; all references to Btu in this report are "at-source" values. The term "at-source" means that adjustments have been made in the calculation of the thermal energy equivalent (Btu) for losses in energy that occur during generation, transmission, and distribution of the various energy forms, as specified in: ERCDC, 1977, Energy Conservation Design Manual for New Non-Residential Buildings, Energy Conservation and Development Commission, Sacramento, California, and Apostolos, J.A., W.R. Shoemaker, and E.C. Shirley, 1978, Energy and Transportation Systems, California Department of Transportation, Sacramento, California, Project #20-7, Task 8.

/3/ Hannon, B., et al., 1978, "Energy and Labor in the Construction Sector," Science 202:837-847.

/4/ San Francisco Department of City Planning, Downtown Plan EIR (EE81.3), certified October 18, 1984, Vol. 1, pp. IV.G.3-4.

Yes No Discussed *a. Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected? *b. Interfere with emergency response plans or emergency evacuation plans? c. Create a potentially substantial fire hazard?

The project would increase the daytime population in downtown San Francisco. Employees in the proposed building would contribute to congestion if an



emergency evacuation of the downtown area were required. An evacuation and emergency response plan would be developed as part of the proposed project (see p. 27). The project's emergency plan would be coordinated with the City's emergency planning activities. This mitigation measure is proposed as part of the project; thus this topic will not be discussed in the EIR.

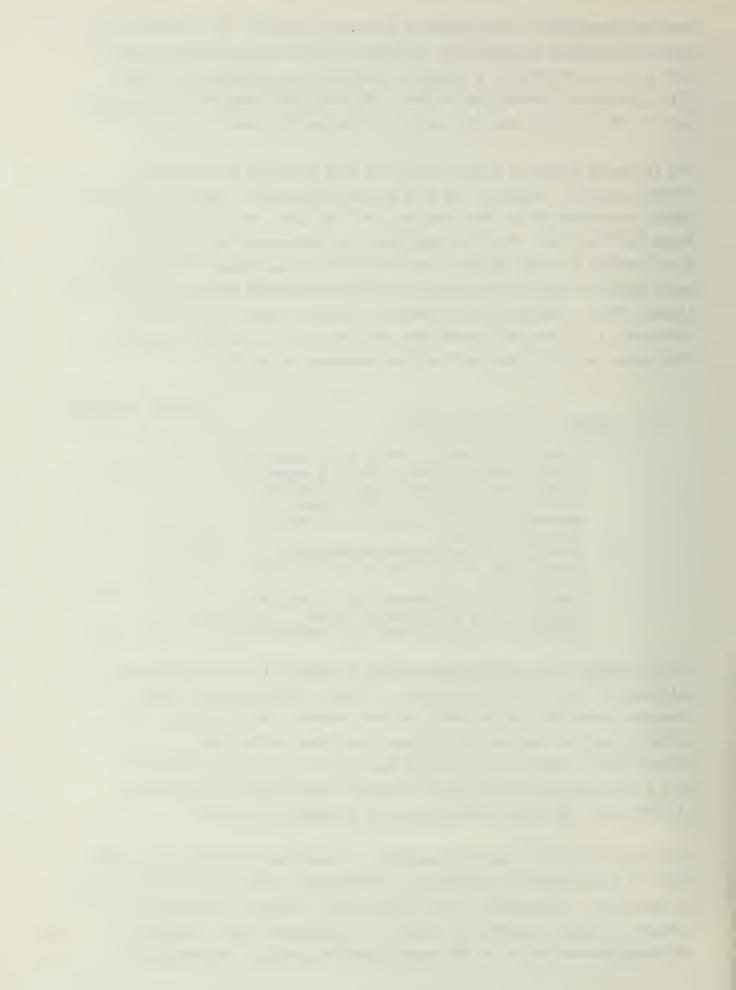
The increased number of persons using the site would not substantially increase the fire hazard at the site as the project would conform to the Life Safety provisions of the San Francisco Building Code, and Title 24 of the State Building Code. The Fire Department has determined that no additional fire stations would be needed to serve cumulative development until the most major proposals came on line (such as Rincon Point/South Beach and Mission Bay (Edward Phipps, Assistant Chief, Support Services, Letter July 9, 1984.) Therefore, it is not anticipated that the project would create a substantial fire hazard and this issue will not be discussed in the EIR.

13.

Cul t	ural. Could the project:	Yes	No	Discussed
*a.	Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a	V		v
*b.	scientific study? Conflict with established recreational, educational, religious or scientific uses of the area?	<u>x</u>	x	<u>x</u>
с.	Conflict with the preservation of buildings subject to the provisions of Article 10 or (pr posed) Article 11 of the City Planning Code?	0-	X	x

Archival research was conducted regarding the possibility of encountering artifacts on the site./1/ The project site was located along the San Francisco waterfront during 1849; archival research indicates that it is unlikely that the remains of a ship would be found on the site. Archaeological remains from the Gold Rush period could exist on the site. Such a find could be considered of potential archaeological and historic significance. Cultural resources will be discussed in the EIR.

The project site is currently occupied by a three-story concrete garage (not rated as architecurally significant in the Downtown Plan); this building would be demolished. The project block includes four buildings designated as Category I, Retain Essentially Intact, in the Downtown Plan. Category I buildings are defined as of the highest architectural and environmental



importance. The Pine-Sansome Conservation District identified in Article 11 of the City Planning Code, is located west of the project site, and encompasses the building at the northeast corner of the Pine/Sansome intersection across Pine St., northwest of the project, and buildings west of Sansome St., from mid-block between California and Pine Sts. to mid-block between Pine and Bush Sts. (see Figure 1, p. 2). The Conservation District extends west to within one lot of Montgomery St. According to Article 11, the buildings in the Pine-Sansome Conservation District generally have a high design quality and they essentially compose an entire pre-World War II streetscape.

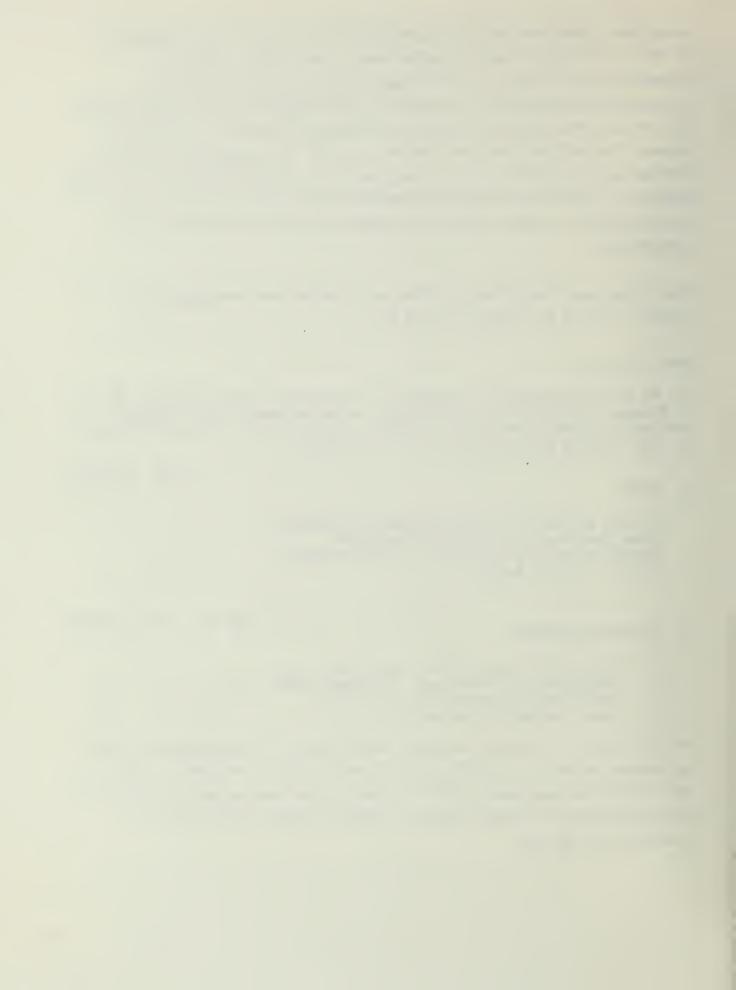
The project would not directly affect any architectural resources; this subject will not be discussed in the EIR.

NOTE - Cultural

/1/ An archival search was conducted for the project by Allen Pastron, Ph.D., in November 1984; the resulting cultural resources report is on file and available for public review at the Office of Environmental Review, Department of City Planning 450 McAllister St., San Francisco.

C.	OTHER		Yes	No No	Discussed
	Require approval of permits from City Departments other than Department of City Planning or Bureau of Building Inspection, or from Regional, State or Federal Agencies?				
D.	MITIGATION MEASURES	Yes	No	N/A	Discussed
	 If any significant effects have been identified, are there ways to mitigate them? Are all mitigation measures identified above included in the project? 	<u>X</u>	X		<u>x</u>

The following are mitigation measures related to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures and also including other measures which would be, or could be, adopted to reduce potential adverse effects of the project as identified in the EIR.



Visual Quality

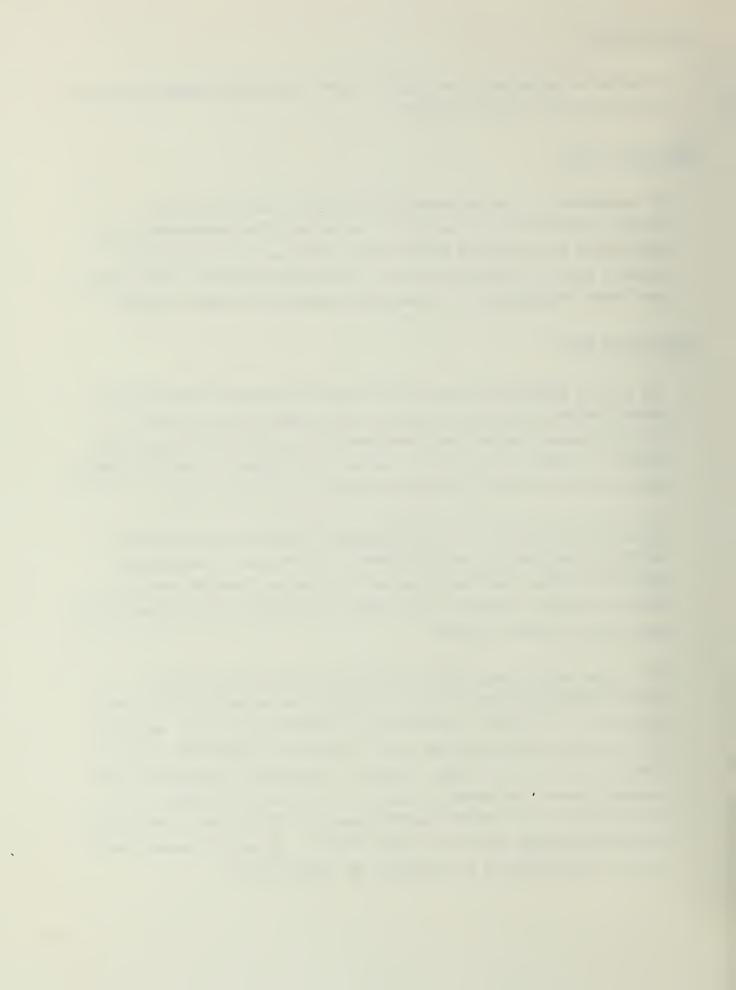
 In order to reduce obtrusive light or glare, the project sponsor would use no mirrored glass on the building.

Operational Noise

- As recommended by the Environmental Protection Element of the San Francisco Master Plan, an analysis of noise reduction measurements would be prepared by the project sponsor and recommended noise insulation features would be included as part of the proposed building. For example, such design features would include fixed windows and climate control.

Construction Noise

- The project sponsor would require the project contractor to muffle and shield intakes and exhaust, shroud or shield impact tools, and use electric-powered, rather than diesel-powered, construction equipment, as feasible, so that noise would not exceed limits stated in the City's Noise Ordinance (Article 29, San Francisco Administrative Code, 1972).
- The project sponsor would require the general contractor to construct barriers around the site and stationary equipment such as compressors, which would reduce construction noise by as much as five dBA, and to locate stationary equipment in pit areas or excavated areas as these areas would serve as noise barriers.
- The project sponsor would require that the construction contractor predrill holes for piles, in order to minimize noise and vibration from piledriving. The actual pounding from piledriving would occur during a five- to eight- minute span per pile. The project sponsor has agreed to limit piledriving to the hours resulting in the least disturbance to the greatest number of neighboring uses. For nighttime pile driving, this would require a work permit from the Director of Public Works, pursuant to San Francisco Noise Ordinance Section 2907(c). The project sponsor would schedule piledriving so as to disturb the fewest people.

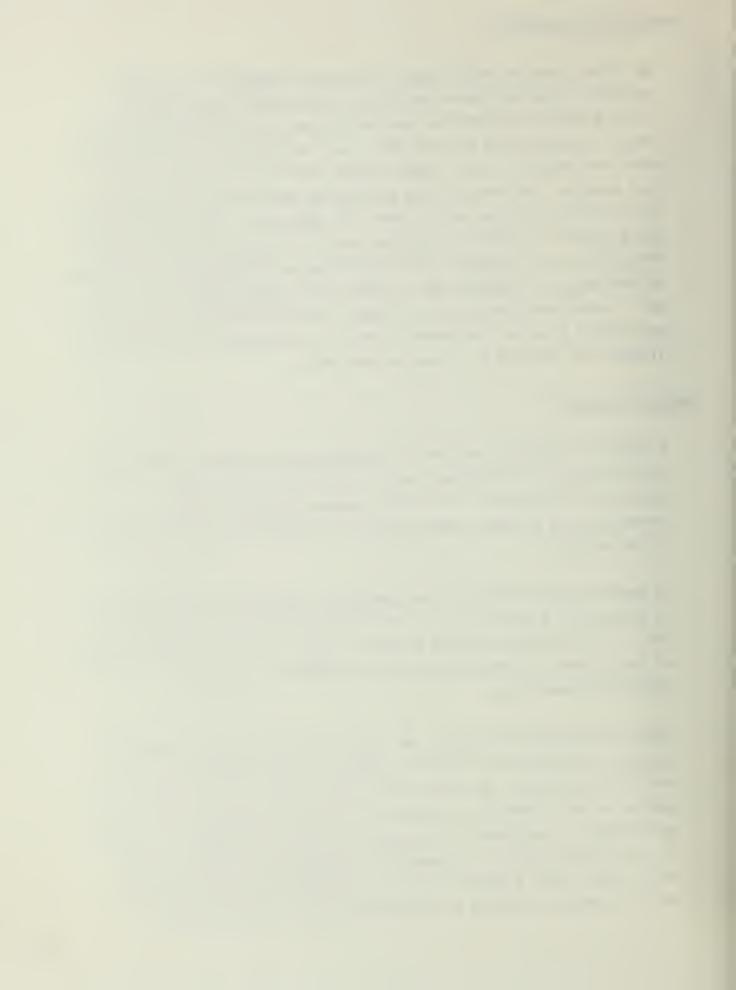


Construction Air Quality

The project sponsor would require the general contractor to sprinkle demolition sites with water continually during demolition activity; sprinkle unpaved construction areas with water at least twice per day to reduce dust generation by about 50%; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soil, sand, or other such material; and sweep streets surrounding demolition and construction sites at least once per day to reduce TSP emissions. The project sponsor would require the general contractor to maintain and operate construction equipment so as to minimize exhaust emissions of TSP and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs (to reduce emissions) for equipment that would be in frequent use for much of a construction period.

Geology/Topography

- A detailed foundation and structural design study would be conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.
- If dewatering were necessary, any groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to reduce the amount of sediment entering the stormdrain/sewer lines.
- Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based upon this discussion, the soils report would contain a determination as to whether or not a lateral and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey is recommended, the Department of Public Works would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this



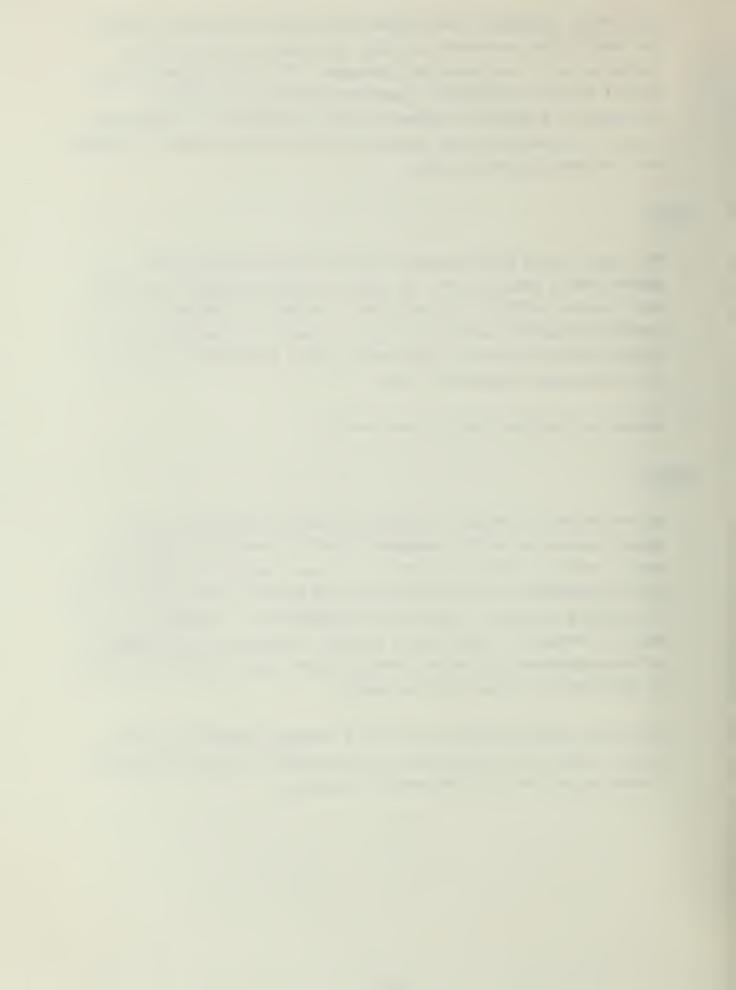
monitoring. Groundwater observation wells would be installed to monitor the level of the water table and other instruments would be used to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable subsidence were to occur during construction, groundwater recharge would be used to halt this settlement. Costs for the survey and any necessary repairs to service under the street would be borne by the contractor.

Energy

- The project would be more energy efficient than required by State
 Administrative Code Title 24. To conserve electric energy, the project
 would include multiple light-switching; a variable air volume air
 conditioning system; and an outside-air / return-air economizer cycle. A
 carbon monoxide monitoring system would control garage ventilation, to
 avoid unnecessary operation of fans.
- Natural gas would be used for space heating.

Hazards

- An evacuation and emergency response plan would be developed by the project sponsor or building management staff, in consultation with the Mayor's Office of Emergency Services, to insure coordination between the City's emergency planning activities and the project's plan and to provide for building occupants in the event of an emergency. The project plan would be reviewed by the Office of Emergency Services and implemented by building management insofar as feasible before issuance by the Department of Public Works of final building permits.
- To expedite implementation of the City's emergency response plan, the project sponsor would prominently post information for building occupants concerning what to do in the event of a disaster.



E. MANDATORY FINDINGS OF SIGNIFICANCE

YES NO DISCUSSED

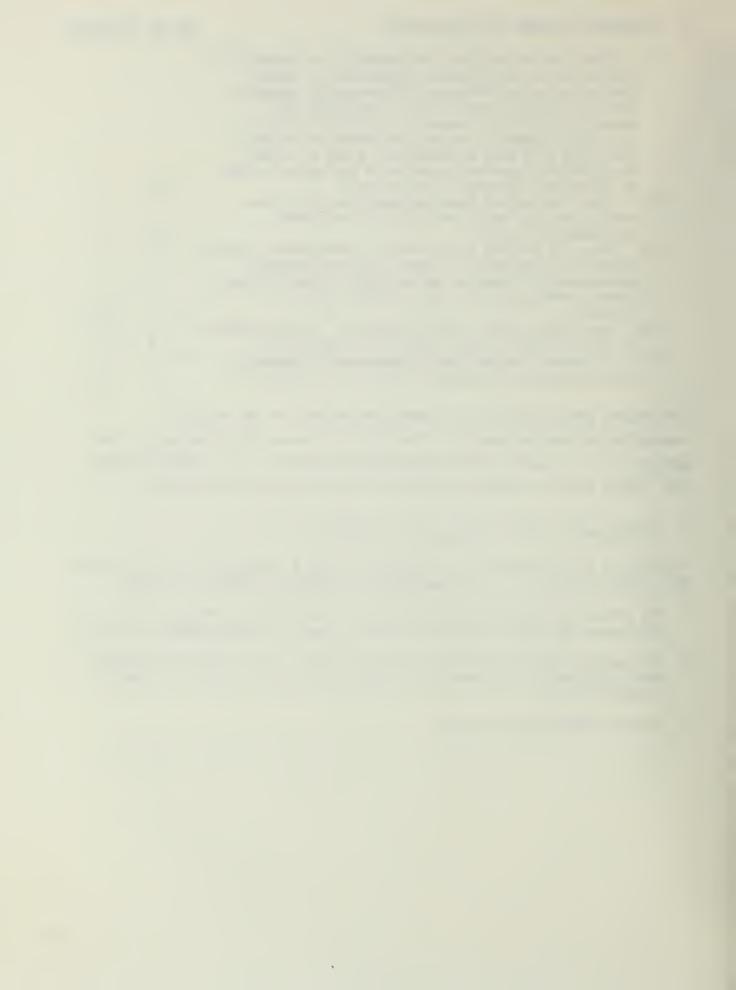
*].	. Does the project have the potential to degrade the			
	quality of the environment, substantially reduce			
	the habitat of a fish or wildlife species, cause a			
	fish or wildlife population to drop below self-			
	sustaining levels, threaten to eliminate a plant			
	or animal community, reduce the number or restrict			
	the range of a rare or endangered plant or animal,			
	or eliminate important examples of the major periods			
	of California history or pre-history?		Y	
*2	Does the project have the potential to achieve		~	
	short-term, to the disadvantage of long-term,			
	environmental goals?		Y	
*3	. Does the project have possible environmental effects		^	
	which are individually limited, but cumulatively			
	considerable? (Analyze in the light of past projects.			
	other current projects, and probable future			
	projects.)	٧		Y
*1		<u>^</u> -		
~4,	Would the project cause substantial adverse effects		v	
45	on human beings, either directly or indirectly?			
^5,	Is there a serious public controversy concerning		.,	
	the possible environmental effect of the project?		X	

The project would contribute to cumulative effects in the areas of transportation and air quality. The EIR will incorporate by reference the analyses for air quality and transportation contained in the Downtown Plan EIR. Those analyses remain current for future and project conditions.

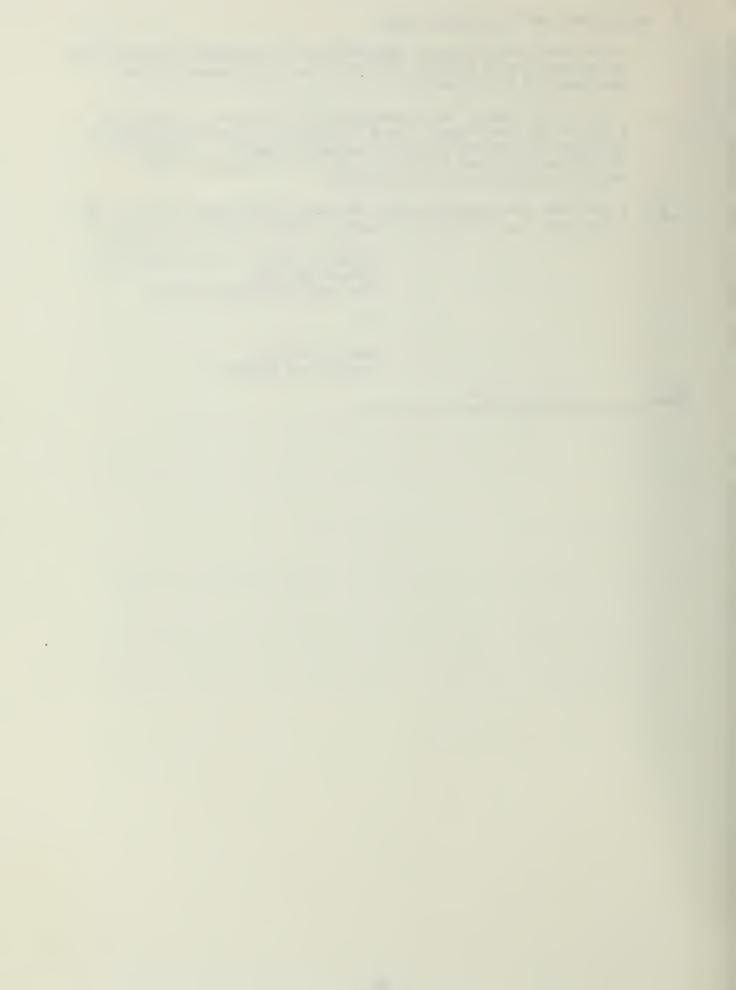
F. DETERMINATION THAT A TIERED EIR IS REQUIRED

In light of the discussion in this Initial Study a tiered EIR is required for this project pursuant to the requirements of Section 21094(b) as follows:

- 1. The project would be consistent with the Downtown Plan, policies and ordinances for which a Final EIR (EE 81.3) was certified October 18, 1984;
- 2. The project would be consistent with applicable local land use plans and zoning pursuant to the Downtown Plan and Planning Code, with allowable exceptions; and,
- 3. Section 21166 does not apply.



G. ON	N THE BASIS OF THIS INITIAL STUDY:	
	I find the proposed project COULD environment, and a NEGATIVE DECLAR Department of City Planning.	NOT have a significant effect on the ATION will be prepared by the
	I find that although the proposed effect on the environment, there we this case because the mitigation mediscussion, have been included as NEGATIVE DECLARATION will be prepared	ILL NOT be a significant effect in easures, numbersin the part of the proposed project. A
<u>X</u>	Ba	ENTAL IMPACT REPORT is required. October 10. Solution 10
Date:_		an L. Macris rector of Planning



FEDERAL AND STATE AGENCIES

Northwest Information Center California Archaeological Inventory

California Department of Transportation Public Transportation Branch

REGIONAL AGENCIES

Bay Area Air Quality Management District

CITY AND COUNTY OF SAN FRANCISCO

Bureau of Building Inspection

City Attorney's Office

Landmarks Preservation Advisory Board

Mayor's Economic Development Council

Public Utilities Commission

Public Utilities Commission Bureau of Energy Conservation

Recreation & Park Department

San Francisco Bureau of Engineering

San Francisco Department of Public Works Bureau of Engineering

San Francisco Department of Public Works Mechanical Engineering Section

San Francisco Department of Public Works Traffic Engineering Division

San Francisco Fire Department

San Francisco Municipal Railway

San Francisco Real Estate Department

Water Department

GROUPS AND INDIVIDUALS

AIA San Francisco Chapter

Bay Area Council

Bendix Environmental Research, Inc.

Tony Blaczek Finance Department Coldwell Banker

Dalum Corporation c/o Midway Trading Co.

Michael V. Dyett Blayney-Dyett

Environmental Impact Planning Cathleen Galloway Brown

Friends of the Earth Geoff Webb

The Foundation for San Francisco's
Architectural Heritage
Mark Ryser

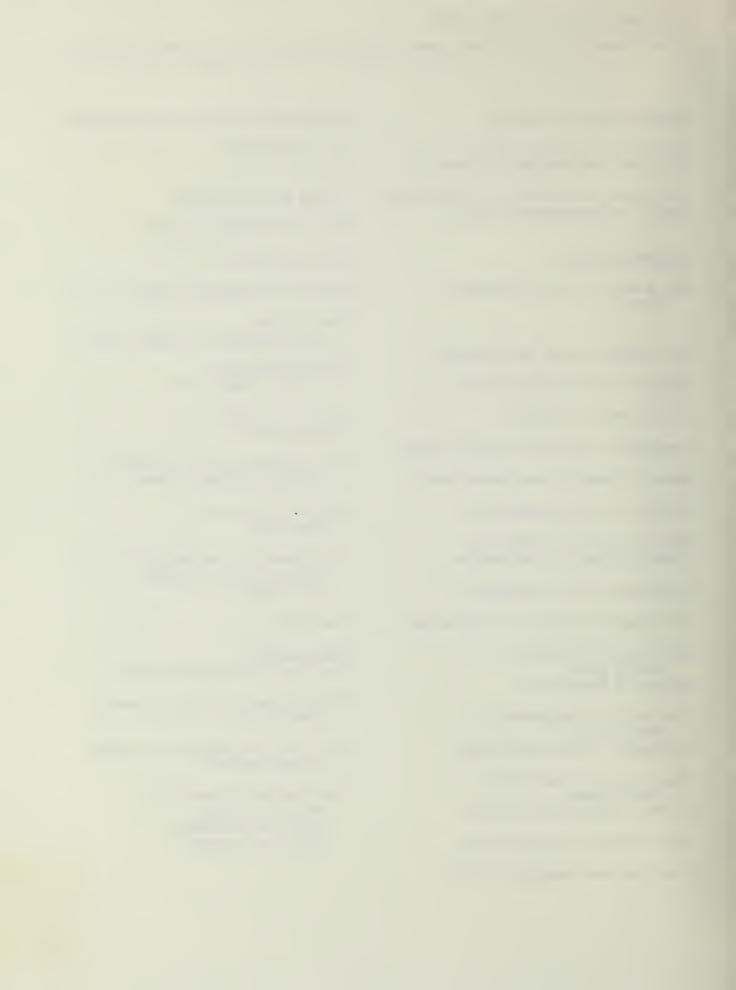
Sue Hestor

Bruce Marshall San Francisco Muni Coalition

Planning Analysis & Development Gloria Root

San Francisco Chamber of Commerce Richard Morten

San Francisco Convention & Visitors Bureau George D. Kirkland Executive Director



San Francisco Planning & Urban Research Association

San Francisco Forward Harriet B. Levy

San Francisco Tomorrow Tony Kilroy

Sierra Club Becky Evans

-

Tenants and Owners Development Corp.
John Elberling

Calvin Welch
Council of Community Housing
Organizations

MEDIA

Annette M. Granucci Commercial News Publishing Co.

San Francisco Bay Guardian Patrick Douglas. City Editor

San Francisco Business Journal Kirstin E. Downey

San Francisco Chronicle Evelyn Hsu

San Francisco Examiner Gerald Adams

San Francisco Progress E. Cahill Maloney

The Sun Reporter

Tenderloin Times Rob Waters

LIBRARIES

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PROJECT ARCHITECT

Skidmore, Owings & Merrill Steve O'Brien

PROJECT ATTORNEY

Morrison & Foerster Zane Gresham

